6. SAD and AAP Options Appraisal

6.1 Identification of Options

The SAD and AAP are intended to contribute towards achieving the objectives set out in the BCCS. The BCCS therefore provides the strategic direction that any options should seek to follow. However, some of these objectives could be achieved in more than one way, and in a few cases there is supporting evidence to show that circumstances have changed since the BCCS was prepared such that the approach expected by the BCCS is no longer appropriate. A significant number of Options were therefore identified for both plans during the course of plan preparation. The Options identified for the SAD were mostly alternative approaches towards the location of development rather than site-specific options, but many of the options for the AAP were site-specific.

Most of the Options were identified at the Issues & Options stage in 2013 and are listed in the Issues & Options Reports (April 2013). The Options were refined and updated in 2015, having regard to the outcomes of the Issues & Options consultation, the second 'call for sites' in 2013, and further technical work on land availability and viability and deliverability of development carried out during 2014 and 2015.

The SA Matrices summarising the outcomes of the Revised Options Appraisal were published on the Council's website in 2015 alongside the Preferred Options for the SAD and AAP. A final review of the Options was carried out following the consultation on the Preferred Options for the SAD and AAP (September – November 2015). A small but significant number of changes to policy wording were made in response to this consultation and it has been necessary to update the SA as a result. In particular, the policy about specialist housing (HC3) has been revised to clarify the approach towards the provision of such development in and adjacent to centres, and the policy about gypsy and traveller sites (HC4) has been amended to refine the total number of new sites to be provided: for the latter, the proposed sites have now been individually appraised.

All of the reasonable alternatives for the SAD and AAP have been subject to SA, and the outcomes of this were summarised in the Options Appraisal Report published alongside the SAD and AAP Issues & Options Reports. As noted above (Chapter 2, Section 2.1), the Options Appraisals have been carried out by the same Council officers and teams responsible for plan preparation, because there were no other resources available to the Council. The

scoring has been subjective, and has made use of the baseline evidence gathered (see Chapter 4, Sections 4.2 - 4.3), including mapping and other readily available information about the sites under consideration, and the physical and environmental constraints.

6.2 Reasons for Selecting and Rejecting Options

The choice of Options available has reflected the scope and limitations of the SAD and AAP as land use plans whose main purpose is to deliver the requirements of the BCCS at a local level and address other local objectives (see Chapter 1, Section 1.2 and Chapter 3, Section 3.5). As such, some Options that might otherwise be considered are not appropriate for these plans. For example, it would not be a 'reasonable alternative' for the plans to not aim to meet the requirements for new development identified in the BCCS, or to propose development that would conflict with the BCCS spatial strategy and policies, unless there are sound reasons for departing from the BCCS.

Options for the SAD

The Council has identified **32** sets of alternative Options for the SAD under 9 topic areas, based on the structure of the plan and the types of land use it needs to make provision for. A total of **98** separate Options have been identified. A full listing of all of the Options identified for the SAD can be found in **Appendix H**. The Options are listed in the left-hand column of the schedule, which includes a description of each Option and the reasons for identifying it, a summary of the outcome of the Options Appraisal, the current status of the Option (January 2016), and the reasons for including it in the SAD or for rejecting it.

The Options identified for the SAD are mostly **spatial options** rather than options for specific sites, and are based on different approaches towards delivering the BCCS requirements or local requirements for each type of development. It would not have been feasible or helpful to have carried out a detailed appraisal of every site-specific option for the SAD, because this would have involved appraising hundreds of individual sites. However, some of the spatial options identified included groups of sites, or assumed that particular sites would be included, so the appraisal did consider the overall effects of allocating these sites. The overall results of the Options Appraisal are outlined in Section 6.5 below.

Options for the AAP

The main function of the AAP is to deliver a strategy for the regeneration of the Town Centre, which is the strategic centre for Walsall identified in the Black Country Core Strategy (BCCS). The Town Centre is the most important centre in the borough, is the most accessible place in the borough being well-connected to public transport routes, and has the main concentration of shops, offices and amenities in the borough. As it is a major location for employment, the Town Centre also plays an important role in the borough's economy.

The Council has identified a wide range of issues that the AAP needs to address to improve the health and competitiveness of the Town Centre and encourage investment. The AAP Options are therefore generally more detailed than the Options for the SAD and many relate to policy or land use choices for particular sites or areas of the Town Centre. As with the SAD, the Options for the AAP have been refined at each stage in the development of the plan, to take into account the outcome of the public consultation on the plan and the comments made on the options for the Town Centre.

As a result of this, there are many more options for the AAP than there are for the SAD. The Council has identified 47 sets of alternative options, and 144 options in total. A full listing of the Options identified for the AAP can be found in **Appendix I**. The Options are listed in the left-hand column of the schedule, which includes a description of each Option and the reasons for identifying it, a summary of the outcome of the Revised Options Appraisal, the current status of the Option, and the reasons for choosing it as part of the Preferred Options or for rejecting it. The results of the Options Appraisal are outlined in Section 6.6 below.

6.3 Options Appraisal – Options Rejected

Some of the Options identified were rejected by the Council during the course of the plan preparation process because they were not considered to be realistic options for the SAD and AAP. These Options have been excluded from the Options Appraisal, because the Council is only obliged to consider 'reasonable alternatives.' The Options which have been rejected for this reason are listed in **Appendices L and M** of this report, which explain why they are not considered 'reasonable.'

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¹ See Article 5 of SEA Directive (2001/42/EC).

6.4 Habitats Regulations Assessment (HRA) – Potential Effects of SAD and AAP on European Sites and Options for Mitigation

Potential Effects on Cannock Extension Canal SAC

Although effects on the SAC were 'screened out' in the HRA Screening Assessment of the BCCS by UE Associates (June 2010), there are site allocations in the SAD for which potential impact pathways exist. These are summarised below. However, it is not anticipated that the AAP will have any effects on the Cannock Extension Canal SAC because the Town Centre is remote from the canal and there are no potential impact pathways.

The SAD proposes to safeguard land that may be required for the Hatherton Branch Canal Restoration Project, which could have impacts on the Cannock Extension Canal due to effects on water supply. At the time the BCCS was developed, Natural England indicated that there did not appear to be any suitable measures that could be put in place to prevent the proposed connection causing an adverse effect upon the ecological integrity of the site.

Taking into account the concerns of Natural England, Walsall Council (in partnership with Cannock Chase District Council) commissioned advice from a barrister and David Tyldesley and Associates during 2008. The advice obtained confirmed that safeguarding the route is not in itself likely to lead directly to a 'significant' effect on the integrity of the SAC, as development that may result from the provisions of the BCCS will require planning permission. Consequently, the Council has safeguarded the land required for the restoration project in the SAD in a manner consistent with that which Cannock Chase District Council has taken in its adopted Local Plan (2014). SAD Policy EN4 (b) relates specifically to the Hatherton Branch Canal, and requires that technical work, including demonstrating that adverse ecological effects can be prevented, is provided prior to the project receiving any support as a result of the allocation.

The only other development identified in the SAD which could potentially affect the canal is 'Yorks Bridge,' an area on the boundary with Cannock Chase District which is identified as an indicative Area of Search for fireclay extraction in the BCCS (BCCS Policies MIN3 and MIN4 and Minerals Key Diagram). Mineral extraction in this location is likely to involve working on both sides of the boundary, including land in Cannock Chase District which is in close proximity to the canal. As fireclay can only be worked in association with coal, it would be extracted using opencast methods. The Justification to BCCS Policy MIN4 notes that any

proposals for fireclay and coal extraction in this location will require a HRA demonstrating that they would not harm the integrity of the SAC.

The SAD Policies Map does not define the boundary of the Yorks Bridge Area of Search, as it is difficult to identify a meaningful boundary. The lack of any current interest from the coal and ceramics industry also suggests there is little prospect that any proposals for fireclay and coal extraction will come forward in this area within the plan period. There is also an issue of consistency with the emerging Staffordshire Minerals Local Plan (submitted for examination in January 2016), which does not identify an Area of Search in this location. However, SAD Policy M9 makes reference to the BCCS proposal, and provides more detailed guidance on the issues that mineral extraction proposals will be expected to address. This includes a requirement in Part (h) xi of the policy for planning applications for clay and coal extraction in the Yorks Bridge area to be accompanied by a HRA, demonstrating that the proposal will not have any adverse effects on the integrity of the SAC.

Potential Effects on Cannock Chase SAC – Options Considered

The BCCS HRA Screening Assessment (June 2010) by UE Associates identified potential for housing development in Walsall to increase visitor pressure on Cannock Chase SAC. An 'Appropriate Assessment' was therefore carried out, which identified potential for increased recreational pressure and recommended various actions to mitigate this.

The BCCS Inspectors' Report recommended that in order to comply with the Habitats Regulations, when preparing the SAD and AAP the Council should investigate the effects that proposed residential development might have on the SAC, from increased recreational pressures. In accordance with the SEA Regulations, the Council has identified and evaluated 7 Options for mitigation of the potential effects. The Options were developed following receipt of expert advice from DTA Ecology during late 2015. The advice raised several issues in respect of the only Option currently advocated by Natural England (and accepted by a number of other local authorities) to mitigate the in-combination effects of proposed new housing development on the SAC, which is to define a 12 mile (15km) 'zone of influence' (ZOI) around Cannock Chase, within which all net increases in housing development are assumed to affect the integrity of the SAC due to increased visitor pressures.

The proposed 15km ZOI would cover most of the north of the borough, and could therefore affect housing proposals in the SAD in this area. Options for mitigating the effects will therefore need to be considered in relation to potential site allocations for housing in the

SAD. The proposed ZOI would also overlap slightly with the northern edge of the Walsall Town Centre AAP boundary. However, the area of the Town Centre affected is small, and as the AAP proposes only office and educational uses within it, it is considered that the AAP will not have any effects on the SAC and no further evaluation is required.

However, the Council has identified six further alternative Options, some of which were identified as a result of the guidance provided by Natural England, others were identified due to the Council's involvement in work/ discussions with the Cannock Chase SAC Partnership, and others were identified as a result of expert advice, having had regard to the CIL, SEA, Habitats Regulations and Habitats Directive. These are outlined below.

Option 1 - Adopt 15km ZOI as a default area and Option 2 - Sign the SAC Partnership MOU

Both of these Options are based on the Cannock Chase SAC Partnership's, and Natural England's application and interpretation of the visitor survey evidence available to support a proposed 15km 'Zone of Influence' (ZOI).

Option 3 - Adopt 8km as the ZOI

This Option was identified on the basis that this approach is more likely to be in accordance with the CIL Regulations by taking into account the type of visitor (regular) that is likely to result in a definite impact on the SAC's qualifying features. An element of the evidence base relied upon to support ZOIs surrounding other European protected sites elsewhere in the country (e.g. Ashdown Forest SPA/SAC, Thames Heath Basin SPA and Dorset Heaths SPA).

Option 4 - Adopt findings and conclusions of more recent HRA

This Option was identified having had regard to Defra's 'Guidance on competent authority coordination under the Habitats Regulations' (2012), which Walsall Council is obliged to have regard to under the provisions of 65(4) of the Habitats Regulations. It is therefore a 'reasonable alternative' for the Council to consider this.

Option 5 - Extend scope of development required to make contributions

This Option also takes into account the potential effects of other types of development (e.g. hotels, retail and leisure), which are also likely to increase recreational pressure to the SAC to contribute towards mitigating possible effects from increased recreational pressure.

Option 6 - Restrict or stop active promotion (Rejected)

The Option was identified because the SAC is part of an AONB, and unlike a National Park, there is no obligation to promote an AONB an area for outdoor recreation. However, this Option has been rejected as it is not a 'reasonable alternative' for the SAD - none of Cannock Chase is in Walsall Borough, therefore Walsall Council has no control over the promotion of recreational activities within the area. As this is not a 'reasonable alternative' it has not been subject to appraisal.

Option 7 - Identify a ZOI based on activities such as walking and dog walking

This Option was developed having had regard to the requirements of the CIL Regulations.² While walking and dog-walking can reasonably be described as having a real risk to the SAC, mountain biking and horse riding cannot, as they present only hypothetical risks. This is considered to be the case because it is reasonable to assume that most able-bodied occupants of the average household might walk recreationally, whereas the same cannot be said for each household in respect of mountain bike or horse riding. Consequently, it is uncertain whether developer contributions throughout the entire proposed ZOI could be sought legitimately.

The SA outcomes are summarised in **Appendix N**. This indicates that Options 1, 2 and 7 are likely to have negative effects on many of the SA Objectives. These effects are as a result of the Council being potentially unable to achieve a sustainable pattern of development in relation to its residential allocations. The DTZ viability evidence accompanying the SAD and AAP indicates that some brownfield sites located within the proposed 15km Cannock Chase ZOI may not be able to contribute to a strategic package of mitigation due to development constraints which affect the economic viability of development. Were such a contribution to be required in order to comply with the Habitats Directive, the Council would be obliged to refuse planning permission if the contribution is not forthcoming (NPPF paragraphs 118 and 119).

Alternative Options that result in more positive effects on the SA Objectives are Options 3 & 4. Walsall Council's Preferred Option is Option 4 as it no longer appears that there is a requirement for a package of mitigation funded by developer contributions in order to mitigate the effects of increased recreational pressure. The selection of this Option is discussed in more detail in Appendix H of the SA Report and the HRA Screening Assessment that accompanies the SAD and AAP. The Option takes into account the findings and

² The Community Infrastructure Levy Regulations 2010 (as amended) (SI 2010 No. 948): http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents

conclusions of the most recent HRA work undertaken in respect of managing recreational pressure at the site. The AONB Partnership's HRA work in respect of its Visitor Management Plan 2014-2019 and Visitor Management Strategy 2015 'screens out' the effects of increased recreational pressure associated with both plans, in combination with other plans and projects, and does so with no explicit reference to a reliance on a package of mitigation to be funded by developer contributions. Therefore the Council has selected this Option having concluded that there are no measures required to mitigate the potential effects resulting from the residential allocations of the SAD and AAP.

6.5 SAD Options Appraisal – Overview of Results

Options Appraisal Outcomes and Justification for Preferred Options

The results of the Options Appraisal are set out in the Revised SAD Options Appraisal - Completed Matrix (January 2016). This presents the results of the appraisal of all the Options identified for the SAD throughout the plan preparation process. Options identified at the Issues & Options stage (April 2013) are in black text, new or refined Options identified at the Preferred Options stage (September 2015) are in blue text, and new or refined Options identified prior to Publication (March 2016) are in purple text.

The outcomes of the Options Appraisal are summarised in **Appendix H** of this report, which explains how the SA outcomes have influenced the choice of the Preferred Options for the SAD. The Appendix lists each Option identified, explains why it was selected, the outcome of the appraisal, and its current status, such as whether it has been rejected or taken forward as part of the Preferred Options for the SAD.

Table 28 below lists each of the Preferred Options for the SAD by topic. The table identifies the reasons for choosing each Option in preference to the other Options considered, the overall SA score, and the predicted effects. While most of the Preferred Options are predicted to have positive effects, some of the options for minerals are predicted to have negative effects, and in some cases, significant negative effects.

Negative Effects of Preferred Options - Potential for Mitigation

The only Preferred Options for the SAD where negative effects have been identified are:

- Sand and Gravel Extraction Minerals Option 4b: BCCS Areas of Search Only;
- Brick Clay Extraction Minerals Option 5a: Stubbers Green Area of Search and Permitted Sites Only;
- Fireclay Extraction Minerals Option 6d: Do not Identify Yorks Bridge Area of Search
 Rely on Existing Local Plan Policy; and
- Minerals Site Allocations Minerals Option 8a: Allocate Sites for Mineral Extraction.

In the case of Minerals Options 4b and 5a, the effects are predicted to be significant. Unfortunately, such effects will be inevitable if mineral extraction takes place in the locations identified, and it is not possible to identify any 'reasonable' alternatives for the SAD that could prevent these effects.

Minerals can only be worked where they are found, which limits the Options available for potential extraction areas. The Options available are further limited by constraints, such as sterilisation by urban development, proximity to urban development, and the existence of designated environmental assets. While this may not rule out mineral extraction, it may make it less viable where mineral extraction would have multiple effects, each of which would have to be mitigated or compensated for.

The SAD also cannot override the provisions already in the local plan, such as the indicative Areas of Search for mineral extraction already identified on the BCCS Minerals Key Diagram, as these will remain in effect at least until the BCCS is reviewed. It also cannot override the effects of existing planning permissions for mineral extraction. Apart from the existing and former quarries, Walsall has two 'dormant' permissions for mineral extraction at Highfields North (SAD Permitted Minerals Site MP9) and Brownhills Common (SAD Permitted Minerals Site MP5) which could be implemented at any time once a schedule of modern working conditions has been approved.

Existing local plan policies and national policy guidance will apply to new or revised proposals for mineral extraction, including proposals to modify existing permissions (such as proposals for new working conditions or for quarry restoration programmes) and proposals for new mineral extraction sites. The appraisal of the relevant SAD policies has taken into account the effects of application of the existing BCCS and UDP policies, and the 'added value' that the more detailed, site-specific SAD policies would bring, in terms of mitigating harmful effects and encouraging benefits (see Chapter 7).

Table 28: Summary of Preferred Options for the SAD (September 2015), Reasons for Choices, and Predicted Effects

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
General Approach Option 2: Meet Core Strategy Growth Requirements	This is the only reasonable Option for the general approach towards most types of new development in the SAD, as the main purpose of the plan is to deliver the requirements of the BCCS. The only exception is provision for Gypsies, Travellers and Travelling Show-people where evidence suggests the requirements in Walsall are lower than anticipated.	++	Likely to have significant positive effects, as it will deliver the requirements of the BCCS spatial strategy up to 2026, including delivery of housing needed to support sustainable communities, industrial land to support sustainable economic growth, delivery of essential transport infrastructure and delivery of environmental network. Will also encourage regeneration of vacant and derelict land.
General Housing Provision Option 4: Surplus Employment Land, Non-Employment PDL and Surplus Open Space	This Option enables the SAD to allocate a sufficient supply of housing land to meet the objectively assessed need in appropriate locations. At the same time this Option also allows the SAD to safeguard existing employment land that is not surplus to requirements, so that the employment land supply will be sufficient to meet Walsall's future requirements for sustainable economic growth over the Plan period. The Option also includes allocating some areas of poor quality Open Space that are surplus to requirements, where this will not compromise the development of the environmental network.	++	Likely to have significant positive effects, as it is likely to provide sufficient land to meet the BCCS housing requirements, including for affordable housing, in locations that are consistent with the BCCS spatial strategy, as most of the new housing would be delivered on previously-developed sites within the urban area. Affordable homes are also more likely to be accessible to those in need, who are less likely to have access to a car. Overall effects from loss of surplus open space are likely to be neutral, because the open space to be lost would be relatively poor quality and not well-located. Any negative effects would be offset by improvements to visual amenity from redevelopment of poor quality industrial land.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Affordable and Special Needs Housing Option 3: New SAD Policy — Require specialist housing to be in locations with good public transport access: Sites in or close to centres will be particularly encouraged	Many care homes and other specialist housing developments take place on smaller sites that would be too small to specifically allocate for housing in the SAD. Under current policy in the BCCS and UDP, such windfall developments can be appropriate on sites outside the regeneration corridors and centres, including on previously developed land in the Green Belt. However, many such locations can have limited accessibility by public transport, walking or cycling. This can result in residents being isolated and unable to visit nearby services such as shops, and workers and visitors having to be reliant on cars. A policy that seeks to direct such developments to locations with good walking access to services for residents, and good access by public transport for care workers and visitors, would have positive benefits in reducing isolation for residents and improving access to employment.	+	Likely to have positive effects, as it seeks to direct specialist housing to locations with good walking access to shops and other amenities to encourage independence for residents, and locations with good access by public transport for care workers employed in the establishments as well as for visitors. This will reduce dependence on cars.
Provision for Gypsies, Travellers and Travelling Show-people Option 4: Identify sites specifically for Gypsies, Travellers or Travelling Show-people	This option will ensure sites are made available in appropriate locations for travellers and show-people, who are often unable to compete with other higher value land uses.	+	Likely to have positive effects, as it seeks to avoid or reduce unauthorised encampments, including those on sites of nature conservation interest both within and outside the borough. However, the total land area of the proposed sites is negligible, especially compared with that for other land uses addressed by the SAD.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Land for Industry Option 3: Existing Employment Land Supply, Additional Non- Employment PDL and Surplus Open Space	This Option will provide more industrial land opportunities than Option 2, including areas of poor quality open space which are surplus to requirements, if this is necessary to provide a sufficient supply of employment land.	+	Likely to have positive effects overall. It would involve identifying surplus areas of open space and other previously-developed land not currently in employment land use, in addition to the existing employment land supply. This would increase the amount of industrial land available, and is therefore also likely to increase energy consumption and road traffic, including the movement of freight by road (as would Option 4 to a greater extent). Increases in road traffic (including freight) would increase harmful emissions of NO2 and CO2 without mitigation and effects on air quality could be significant if NO2 emissions increase further in areas where the limit values are already exceeded. Some areas of open space and other greenfield sites may be important for biodiversity as well as helping to absorb emissions of CO2, so if Option 3 is taken forward, consideration of impacts on biodiversity and climate change mitigation will play an important role in the site selection process.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Local Centres Option 2: Review to Reflect New Housing Proposals Option 4: Allocate Development Opportunities	This would provide up-to-date Local Centre boundaries and development opportunities. This means the Council is in a stronger position to defend against out-of-centre development which is a key principle of the BCCS. It also means that development opportunities are allocated to meet the future needs of communities.	++	Likely to have significant positive effects overall, and is much more likely to have positive effects than Option 1, which is the 'do nothing' option. There would be greater opportunities for enhancement of the built environment of Local Centres, and to improve the range of services they provide, so that people will have less far to travel to access basic services such as shops and health centres, and are more likely to be able to access them using active travel modes such as walking and cycling.
Out-of-Centre Developments Option 2: Allocate Declining Sites for Other Uses	This option involves a more efficient use of vacant out-of-centre retail sites, where it is unlikely that new retail outlets will re-occupy them. There are a number of out-of-centre allocations that are declining which could be used for alternatives uses such as employment or housing. These allocations would help meet the BCCS targets but also support the strategy of focussing centre use investment within the established centres.	++	Likely to have significant positive effects overall, as it would involve re-allocating declining out-of-centre retail developments, for example, where there are a lot of vacancies, to other uses such as industry or housing. This would enable the sites to be more beneficially used, which would support objectives towards the promotion of sustainable communities and sustainable economic growth. There could also be benefits in terms of investment in the Town Centre and the District Centres if it means that the existing 'town centre' developments displaced from these sites were to relocate there, although this is not necessarily going to happen - uses displaced could also go to other out-of-centre sites to be retained, or to centres/ out-of-centre locations outside the borough, which would be even less accessible to Walsall residents.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Open Space Option 5: Increase Open Space Provision where Appropriate, Safeguard existing Open Space sites with the exception of low quality sites re-allocated for other uses	This option was developed to be in accordance with the Council's Green Space Strategy (2012). It provides a framework with which to protect and re-allocate sites based on an open space hierarchy. Low value open sites are re-allocated for other uses and resources can be generated or focused on improving standards and provision where possible.	+	Likely to have a positive effect overall, as it would involve allocating additional open space for protection where appropriate, safeguarding the majority of existing open space, and the re-allocation of a limited number of low value open space to meet the development needs of the borough. Although it is acknowledged that the option could exacerbate existing quantitative deficiencies of open space provision in some areas. This would have to be mitigated through improving the quality of other open spaces in the borough in accordance with BCCS policy ENV6, UDP policy LC1 and the Urban Open Space SPD (2006). The re-allocation of low quality open space would provide opportunities to raise open space quality, improve the environment and aspirations of communities, and support the delivery of urban regeneration.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Community and Leisure Facilities Option 1: No Site Allocations	This Option has been identified because in practice most new community and leisure facilities will be delivered by providers other than the Council.	0	The overall effects of Option 1 are likely to be neutral overall, although there are uncertainties about some effects. This is the 'do nothing' option, which would be not to allocate any land for community and leisure facilities in the SAD, and to deal with applications for such uses on an individual basis in accordance with existing local plan policies and national policy guidance. The status quo would be maintained, but there are questions over whether existing facilities meet the needs of all communities in Walsall and are accessible to the people they are intended to serve (SA4, SA7, SA13).
University Campus Option 2: Replace 'saved' UDP Policy LC10	UDP Policy LC10 may be out-of-date, so there is merit in reviewing the policy, to ensure that it addresses all the issues likely to be relevant to proposals for future development within the University Campus site.	++	Likely to have significant positive effects overall. It would enable the Council to update the existing UDP policy and provide a single comprehensive policy to guide all future development across the entire University Campus, including the outstanding UDP housing allocation on part of the campus ("saved" UDP Policy H2, Site H2.20). The policy is designed to reflect the proposals to create a new access from the Broadway and manage the needs of the University with the environment.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Environmental Network Option 3: Enhancement Where Opportunities Arise and Targeted Investment	This Option has been identified following further technical evaluation of the extent and quality of natural and built environmental assets in Walsall, including natural green space, and requirements for housing, industry and other development, following the Issues & Options consultation in 2013.	++	Likely to have significant positive effects overall. It is a combination of Options 1 and 2, and would involve a strategy for improving and enhancing all areas of the environmental network where opportunities arise, while also prioritising investment in areas where there is a quantitative or qualitative deficiency in access to green spaces. This will include the allocation of land of ecological value as Open Space (where possible) as well as targeted investment in the development of the environmental network and enhancement of environmental infrastructure (where possible) in "multiple benefit priority areas" identified in the Black Country Core Strategy Environmental Infrastructure Guidance. To rule out areas of surplus green space completely from any enhancement could result in missed opportunities.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Green Belt Boundary Option 2: No Green Belt Review	It is not necessary to release land from the Green Belt to meet the requirements for development in Walsall identified in the BCCS or to meet other local needs, as sufficient previously-developed land and surplus poor quality open space has been identified to meet the requirements.	++	This is the 'do nothing' option and would mean no change to the Green Belt boundary currently defined on the 'saved' Walsall UDP Proposals Map. This Option is likely to have significant positive effects on nearly all of the SA objectives, particularly SA9, as it would mean that the openness of the Green Belt, which covers nearly a third of Walsall's administrative area and is an important element of local character, would be maintained. There are also likely to be significant positive effects on SA2 and SA12, as the Green Belt includes some sites of national importance for biodiversity and some of the "best and most versatile" agricultural land. It also includes areas of open space used for recreation, archaeology, and mineral resources of local and national importance, which could provide the raw materials needed to support economic growth in the urban areas (SA4, SA5, SA8, SA10). The Option is also likely to continue to encourage redevelopment of previously-developed land, including derelict sites, in locations that are more accessible to employment areas and key facilities and services, in line with the Black Country spatial strategy (SA4, SA6, SA12, SA13).

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Green Belt Boundary (continued)		++	While some urban sites are at risk from flooding, so are some sites in the Green Belt. Green Belt land also includes important sources of potable water, provides opportunities for flood management, and for growing energy crops and development of other forms of renewable or low carbon energy that do not conflict with openness, therefore impacts on SA3, SA11 and SA14 are likely to be positive overall. However, effects on SA1 are uncertain, as some previously-developed land is in road corridors where the statutory limit values for NO2 are being exceeded.
Green Belt Policy Option 2: New Green Belt Policy	This will enable the local plan policy to be updated and brought into conformity with current national policy guidance on development in the Green Belt.	++	Likely to have significant positive effects overall. It would involve replacing the existing "saved" UDP Policies ENV2, ENV3 and ENV4 with new policies which are more consistent with the current national policy guidance in the NPPF on development in the Green Belt, and provide up-to-date guidance on the types of development likely to be proposed in the Green Belt in Walsall.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Natural Environment Option 4: Update Natural Environment Designations and refer to existing policy	The designations shown on the UDP Policies Map are out-of-date and incomplete – some SSSI and SINC boundaries have changed and the UDP also does not show SLINCs or areas of Ancient Woodland. There is also a need to clarify how existing local plan policy on the natural environment will be applied alongside current national policy guidance.	++	Likely to have significant positive effects overall, the main difference being that showing the SLINCs and areas of Ancient Woodland is likely to provide greater certainty for developers over where these constraints exist. The Option would involve showing the most upto-date boundaries of designated nature conservation sites, areas of Ancient Woodland and wildlife corridors on the SAD Policies Map. This should ensure that the policy framework for conservation of the natural environment is robust, and that opportunities to conserve important elements of the natural environment and sites of importance for biodiversity and geodiversity are identified, as well as providing opportunities for climate change resilience measures, and for development of greenway networks for walking and cycling to improve access to active transport modes and improve health and well-being of local communities.
Cannock Chase SAC – Mitigation of Effects Option 4: Adopt findings and conclusions of more recent HRA	This Option has been identified having regard to the Defra guidance on 'competent authority' co-ordination, which the Council is obliged to have regard to. It reflects the findings and conclusions of recent HRA work by the Cannock Chase AONB Partnership, in respect of mitigating the effects associated with increased recreational pressure on the Cannock Chase AONB and SAC.	+	Likely to have a positive effect on most of the SA Objectives as more recent HRA work by the Cannock Chase AONB Partnership has 'screened out' likely significant effects associated with increased recreational pressure. This removes the potential to result in the refusal of planning applications, where viability dictates that no developer contributions can be sought.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Cannock Chase SAC – Mitigation of Effects (continued)			This would ensure the delivery of housing on brownfield sites first rather than greenfield sites, in accordance with the BCCS sustainability principles. The benefits of a sustainable pattern of development are wide ranging, but in general, the brownfield sites allocated for housing in the SAD are in sustainable locations with access to a multitude of sustainable transport options, are near to social infrastructure, and this option will ensure that previously developed land is remediated and bring investment into deprived areas.
Flood Risk Option 2: Update Local Plan Flood Risk Policies	The existing local plan policies on flood risk pre-date the latest national policy guidance on the 'sequential approach' and sustainable urban drainage management systems (SuDs) so there is a need for further guidance in the SAD and AAP to clarify how this will be applied in Walsall.	+	Likely to have positive effects overall. It would involve expanding on UDP Policy ENV40 in the SAD, and updating the current evidence on risks from flooding in Walsall, to provide more up-to-date guidance on the extent of flood risk in Walsall and the application of the "sequential test" and guidance on sustainable urban drainage management systems (SuDs) in line with current national policy guidance in the NPPF and NPPG. It is therefore likely to have positive effects on SA2, SA3, SA4, SA8 and SA14 as there would be increased protection from flood risk sources, and opportunities to integrate this into the environmental/ green infrastructure network, resulting in biodiversity, climate change mitigation, and water quality improvements.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Canals Option 2: Additional Policy on Canals	There is scope to provide more locally-specific guidance in the SAD and AAP on development in canal corridors in Walsall, reflecting the key priorities for the canal network in the borough.	++	Likely to have significant positive effects, and greater benefits than Option 1, which is the 'do nothing' option. It would involve providing additional, more locally specific guidance in the SAD for new development within canal corridors and adjacent to canals in Walsall, identifying buildings and structures of importance for local character and requirements to conserve and enhance these assets and maintain water quality, amenity and public access.
Historic Environment Option 2: Update Historic Environment Policies and Designations	There is a need to identify heritage assets in Walsall in the SAD, as most of them are not currently shown on the UDP Proposals Map. There is also a need to provide up-to-date guidance on development opportunities that would help to conserve heritage assets currently at risk in Walsall, including Great Barr Hall and Estate.	++	Likely to have significant positive effects, and greater benefits than Option 1, which is the 'do nothing' option. It would involve updating the existing UDP Policies ENV8 and ENV25 - ENV30 on the historic environment and showing the most up-to-date boundaries of designated heritage assets on the SAD Policies Map. This Option is likely to have significant positive effects on SA5 and SA9, as by showing all of the main heritage assets in Walsall on the Policies Map and providing more up-to-date guidance for development affecting these assets, it is more likely that the design of new developments affecting such assets will have regard to all of the relevant issues, including features that are important for local distinctiveness, and will have positive effects on local character.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Historic Environment (continued)		++	It is also likely to have positive effects on SA10 and SA12, by encouraging the re-use of existing buildings and building materials wherever possible, and the efficient use of land and buildings. It is also likely to have consequential positive effects on SA4 and SA8, as it is likely to encourage well-designed developments that will benefit the health and well-being of local communities who value heritage assets and local character. While there is some uncertainty about the effects on SA1, SA2, SA3, SA7, SA10, SA11, SA13 and SA15, because the option is not site-specific, effects are considered to be neutral overall, as it is assumed that other local plan policies and relevant national policy guidance would also be applied, which would minimise or prevent harmful effects on air quality, biodiversity and geodiversity, climate change mitigation and enhancement, economic growth, equality and diversity, use of energy, transport and accessibility, and the water environment.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Waste Recovery Targets Waste Options 1a and 1b Combined: General Recovery Targets and Recycling Targets	National Planning Policy for Waste expects local plans to address the wider objectives of driving waste as far as possible up the "waste hierarchy" and meeting the municipal waste re-use and recycling targets in the Waste Framework Directive, as well as diverting more waste away from landfill in line with the BCCS. While addressing this requirement, the Option takes into account an existing permission for energy recovery, and recognises that new waste management projects will be delivered by the market, so there are no guarantees that new recycling capacity will come forward. It is therefore preferable to the other Options, including 'do nothing' (Option 1d).	+	Positive effects are likely, as SAD waste management targets will include specific requirements for delivery of new municipal waste recycling and composting infrastructure as well as infrastructure for other types of recovery. This would help Walsall to meet the Waste Framework Directive for re-use and recycling of municipal waste, and would support economic objectives and objectives towards sustainable use of resources, as well as helping to meet the targets in the BCCS for recovery of household, commercial and industrial waste.
Existing Waste Infrastructure Waste Options 2a and 2b Combined: Safeguard All Existing Waste Sites but Prioritise Safeguarding of Strategic Waste Sites	As well as giving priority to safeguarding the most important waste sites in Walsall, this Option would also allow smaller permitted waste management facilities, which could be important for local communities and businesses or may be providing a specialist service, to be safeguarded. By identifying these sites in the SAD, developers seeking to build other types of development in the area will be aware of them, and be better able to identify and deal with potential issues of conflict early on. This would give maximum protection for Walsall's waste infrastructure and reduce the need to develop new sites. It is therefore considered preferable to prioritisation of Strategic Waste Sites only.	++	Significant positive effects are likely, as safeguarding all permitted waste management facilities will help Walsall to retain existing waste capacity that is important for managing waste generated by local industry and local communities, as well as infrastructure that is of national and sub-national importance which is accepting waste from other areas and is diverting significant amounts of waste away from landfill. Identifying existing sites may also help to reduce potential conflicts between existing waste operations and proposed new developments. Effects on the environment, health and amenity are likely to be neutral, as changes to existing facilities must comply with BCCS Policy WM4 and relevant national policy guidance, and will also be subject to regulation.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Suitable Waste Management Locations Waste Option 3b: SAD to Provide Additional Guidance	While BCCS Policy WM4 would still apply, this Option would provide more locally specific guidance to the waste industry on which types of waste facility would considered suitable – in principle - on different types of land in Walsall, including types of land not specifically identified in the BCCS such as the "Consider for Release" employment sites, and open land. It would also identify specific sites likely to be suitable for development of new waste facilities where such sites can be identified. It is therefore considered preferable to the 'do minimum' Option of relying on the existing BCCS policy (Option 3a).	++	Significant positive effects are likely, as it will support delivery of new waste infrastructure in appropriate locations such as on industrial sites, and will also help to reduce potential conflicts between waste operations and other land uses. Clearer guidance on the types of operation suitable on open land would also enable harmful effects on landscape to be prevented or minimised. Effects on the environment, health and amenity are likely to be neutral as they would be localised, and all proposals must comply with BCCS Policy WM4 and relevant national policy guidance, and will also be subject to regulation.
Minerals Safeguarding Area (MSA) Minerals Option 1a: Single MSA	Defining a single MSA covering most of Walsall Borough on the SAD and AAP Policies Maps will minimise the complexity of the information shown on the Policies Maps, given that they also have to show a large number of other site allocations and designations. Further details of where mineral resources can be found in Walsall can be provided in a Technical Appendix.	+	Positive effects are likely overall, as the Option is consistent with the approach in the BCCS – Black Country MSA has already been subject to SA and no significant harmful effects were identified. While the designation of a MSA is a potential constraint on all types of non-mineral development within the area it covers, BCCS Policy MIN1 adopts a pragmatic approach towards non-mineral development in the MSA which would not prevent essential development from taking place, hence the effects on local communities and businesses are considered to be neutral overall.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Aggregates Recycling Minerals Option 3b: Site Allocations and/ or Additional Locational Guidance	This is the Preferred Option for Aggregates Recycling in the SAD as it would provide greater certainty to the public and to the waste and minerals industry on where aggregates recycling could take place within Walsall. The Preferred Option is to safeguard existing permitted recycling sites and identify suitable types of location for aggregates recycling operations, and the main considerations such proposals will be expected to address, over and above those already identified in BCCS Policies WM4 and MIN5. However, it has not been feasible to identify any suitable new sites for allocation. A number of potential site Options were evaluated as part of the Walsall SAD & AAP Minerals Study (2015), but none of them were considered appropriate for allocation, because of the potential site constraints, and the lack of certainty that any of them would be viable or deliverable.	+	Positive effects are likely overall. Providing further guidance in the SAD on suitable locations for recycling facilities is likely to have positive effects on supply of aggregate minerals to meet Walsall's future requirements for development, as it would encourage delivery of new facilities for producing aggregates from alternative sources to quarried products in appropriate locations, and would therefore also contribute towards infrastructure needed to support the local economy. The Option is likely to have neutral effects on other SA Objectives, provided that the guidance gives adequate protection to "sensitive receptors" and environmental assets, and that any sites allocated for aggregates recycling in the SAD are appropriately located.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Sand and Gravel Extraction Minerals Option 4a: BCCS Areas of Search Only	This is the 'do minimum' option. The BCCS Areas of Search (MA1: Birch Lane and MA2: Branton Hill) include quarries which were operating until relatively recently as well as other resources that could be worked. There is no evidence of any serious interest in working any of the sand and gravel resources elsewhere in Walsall. Other Options to identify no Areas of Search or to identify additional or alternative Areas of Search have therefore been rejected. Defining the boundaries on the SAD Policies Map, and including linked policies to provide further guidance on the key issues that sand and gravel extraction proposals in these areas will be expected to address will provide greater certainty to prospective mineral operators, and will also help to prevent or mitigate the harmful effects identified in the SA.		Potential for significant harmful effects without mitigation, taking into account the need to complete restoration of areas already worked, which has not been progressed, and the potential additional effects of further mineral extraction. Effects are therefore mixed and there are some uncertainties, for example, whether proposals for restoration of the former quarries will actually come forward at all. Identification of the Areas of Search in the SAD could encourage further sand and gravel extraction proposals which would have positive effects on future supply of aggregate minerals, although there is no guarantee that the existing application to expand Branton Hill Quarry will be progressed or that any new proposals for working in the Birch Lane Area of Search will come forward. Due to its proximity to residential properties, the Birch Lane Area of Search could have significant harmful effects on the amenity and wellbeing of residents from noise, dust and traffic generated by further quarrying, as well as impacts on visual amenity and landscape character. There is also potential for harmful impacts on the local highway infrastructure and the local highway authority has identified a possible need for junction improvements.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Sand and Gravel Extraction (continued)			However, conditions for people living near the existing access to Branton Hill Quarry would probably improve, as the remaining un-worked areas in the Area of Search are further away from existing and proposed residential areas. Expanding the quarry into these areas would also be dependent on constructing a new access road that would take quarry traffic away from where people live. The bedrock sandstone resources in Walsall underlie much of the eastern edge of the borough, so there are potential alternatives to working within the two Areas of Search identified in the BCCS and SAD. Several potential alternative/ additional Options for sand and gravel Areas of Search were considered in the Walsall SAD & AAP Minerals Project (2015). However, none of the Options identified were without significant constraints, and there is no evidence of any current interest in working in these areas. In some cases the negative effects of mineral extraction are also likely to be greater than at Birch Lane and Branton Hill.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Brick Clay Extraction Minerals Option 5a: Stubbers Green Area of Search and Permitted Sites Only	This has been chosen as the Preferred Option for the SAD in preference to the Preferred Option identified in 2015, which was to identify a second Area of Search around the Highfields North site, as a potential alternative to working within the Jockey Fields SSSI. However, this Option has now been rejected because the majority land owner in the area, who also controls the mineral rights, is unwilling to support mineral extraction on their land. There is a need for the SAD to identify sufficient Etruria Marl resources in Walsall to meet the long-term supply requirements of all three brickworks in the borough if at all possible. The BCCS Area of Search at Stubbers Green (MA5) includes two active quarries which are supplying adjacent brickworks, and unpermitted brick clay resources adjacent to Atlas Quarry which could provide an additional source of supply. The quarries are expected to continue in operation throughout the rest of the plan period. However, the remaining permitted and unpermitted resources in the Area of Search are unlikely to be sufficient to provide a 25-year supply of clay to Sandown Brickworks as well as to Aldridge and Atlas Brickworks. Implementing the 'dormant' permission at Highfields North is likely to be the only means of meeting	SA Score	Significant harmful effects are likely to be unavoidable. There would be some positive effects from the potential increase in supply of brick clay to local brickworks, although it is uncertain whether Sandown Brickworks, which does not have sufficient reserves to meet its long-term requirements, could be supplied from any new working areas at Stubbers Green or from the Highfields North site, as the relevant sites are in separate ownership. While the expansion of Atlas Quarry within the Area of Search would provide sufficient clay to meet the long-term requirements of Aldridge and Atlas Brickworks, it would result in the loss of Stubbers Green SINC, and could also have indirect harmful effects on other designated sites in the area due to impacts on hydrology (Swan Pool & The Swag SSSI and Stubbers Green Bog SSSI). The harmful effects of implementing the 'dormant' permission at Highfields North on biodiversity and the local landscape would be even greater, as this would result in the unavoidable loss of at least part of the Jockey Fields SSSI and SLINC, as well as affecting Grade 2 and 3a agricultural land, and could also have indirect effects on other designated sites to the south, including Swan Pool & The Swag SSSI, due to
	this requirement, but would involve working within the		impacts on hydrology.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Brick Clay Extraction (continued)	Jockey Fields SSSI – around 90% of the permitted site is subject to the SSSI designation. The Preferred Option is therefore to identify the BCCS Area of Search at Stubbers Green, plus other permitted sites, i.e. the Highfields North site and two other sites currently undergoing restoration. The Highfields North site is therefore the only permitted site with significant permitted reserves remaining, and is in separate ownership to the other land within the brick clay resource area north of the A461. However, as it is 'dormant,' the permission can only be implemented once a schedule of modern working conditions has been approved by the Council.		The alternative Option of identifying a second Area of Search around this site did not perform significantly better in terms of reducing the negative environmental effects. While on the one hand working outside the 'dormant' site would offer greater scope to prevent loss or harm of the special features of the SSSI, on the other, the effects on the landscape and hydrology are likely to be similar, and more of the "best and most versatile" agricultural land is likely to be affected. There are no alternative options for brick clay extraction in Walsall than the areas identified in the SAD. The remaining resource area for Etruria Formation clays is limited to the Stubbers Green and Shelfield areas, and the Walsall Wood area around the Highfields North site, to the north of the A461.
Fireclay Extraction Minerals Option 6d: Do not Identify Yorks Bridge Area of Search - Rely on Existing Local Plan Policy	This Option was identified in 2015 as an alternative to the Options identified in the Issues & Options Report (2013) to define the boundary of the indicative Area of Search for fireclay extraction identified in the BCCS at Yorks Bridge (MA6). There is insufficient justification for defining an Area of Search for fireclay at Yorks Bridge in the SAD on the basis of the evidence currently available. While the proposal was supported by the land owner (Wyrley Estate), Staffordshire County Council, Cannock Chase District Council and the Environment Agency have expressed concerns about the potential cross-boundary	-	Likely to have negative effects. Not designating an Area of Search at Yorks Bridge in the SAD does not override the identification of an indicative Area of Search in this location in the BCCS, which will remain in effect at least until the BCCS is reviewed. However, it does mean there is greater flexibility over where working could take place. The Option would also have no effect on the 'dormant' permission for coal and clay extraction on part of Brownhills Common. Implementing this permission would lead to unavoidable loss of part of the Brownhills Common and The Slough SINC, loss of open

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Fireclay Extraction (continued)	effects of working in this area, which is adjacent to the boundary with Staffordshire, and about the possible impacts on designated nature conservation sites in the area, including the Cannock Extension Canal SAC. The viability and deliverability of fireclay and coal extraction in the Brownhills area was evaluated in the Walsall SAD & AAP Minerals Project report (2015). The study concludes that even though there is likely to be a long-term requirement for fireclay to supply a local factory which manufactures pot clay blends (Swan Works), given the lack of interest from the coal industry and the absence of any current working proposals, there is unlikely to be any realistic prospect of fireclay being worked during the plan period. Furthermore, there is a 'dormant' permission for clay and coal working at Brownhills Common which has never been implemented. There is an outstanding application for modern conditions to be applied to this site and another site at Birch Coppice which was previously worked. The proposal has been determined by the Council to be EIA development, and the application is in abeyance pending the submission of an environmental statement.	-	space, and would also affect several Public Rights of Way. The effects would be very long-term if clay is allowed to be stockpiled on-site, as is proposed in the current application for working conditions, although this will not necessarily be permitted. There could also be indirect effects on adjacent designated sites including the Chasewater and Southern Staffordshire Coalfield Heaths SSSI. If a proposal for opencast coal and clay working came forward in the Yorks Bridge area in addition to this, or as an alternative, it could have much greater harmful effects, because it would involve working over a much larger area. It is likely to have significant harmful effects on biodiversity, because like Brownhills Common, it would result in the loss of part of the Brownhills Common and The Slough SINC and could also have indirect effects on other designated sites. Designated sites in the area include Chasewater and Southern Staffordshire Coalfield Heaths SSSI, Cannock Extension Canal SAC/ SSSI, Pelsall Common North SINC, and Wyrley & Essington Canal SLINC. It would also have significant harmful effects on the landscape, including Grade 2 and 3a agricultural land, although the effects may be relatively short-term if restoration follows on immediately afterwards, and there is no long-term stockpiling of clay on-site. The effects of this Option would therefore be similar to the other Options

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Fireclay Extraction (continued)		-	considered, although the extent of harmful effects on amenity, the environment and transport infrastructure is less certain, as it is less clear where working could take place, and which areas could potentially be affected by the operations and traffic impacts. There are no realistic alternative options for coal and fireclay extraction in Walsall other than in the Brownhills area, as this is the only part of the surface coal resource area in Walsall that is not sterilised by built development.
Fireclay Stockpiling Minerals Option 7b: Rely on Existing Local Plan Policy on Stockpiling of Clays	There is insufficient justification for identifying specific locations for "strategic stockpiling" of fireclay in Walsall on the basis of the evidence currently available. The Walsall SAD & AAP Minerals Project report (2015) has evaluated the potential for identifying suitable locations for 'strategic stockpiling' in the SAD, and concluded that this is unlikely to be acceptable anywhere in the Brownhills area, given the likely impacts this would have on existing housing, and the significant environmental and nature conservation constraints of the area. While the possibility of stockpiling is allowed for in BCCS Policy MIN3, the guidance in this policy and in BCCS Policy MIN5 is considered to be sufficient to evaluate the suitability of any proposals, and t is not proposed to identify any preferred locations for "strategic stockpiling in the SAD.	0	Effects are likely to be neutral as the Option would mean relying on existing local plan policy as a basis for evaluating the suitability of future proposals for long-term stockpiling of fireclay in Walsall. Although no preferred locations would be identified in the SAD, the possibility is not ruled out, and BCCS Policies MIN3 and MIN5 provide a basis for assessing the suitability of any proposals that come forward during the plan period. There is already a proposal for stockpiling of clay at the Brownhills Common site which is included in the current application for working conditions to be applied to this site and to the Birch Coppice site (see Fireclay Extraction above). The overall effects of this Option are considered to be neutral as they would not add or subtract anything from the existing BCCS policy.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Minerals Site Allocations Minerals Option 8a: Allocate Sites for Mineral Extraction	Although this Option has been chosen as the Preferred Option, only one of the site Options considered is actually proposed for allocation. The Walsall SAD & AAP Minerals Project (2015) evaluated the viability and deliverability of five potential Site Allocation options, three for sand and gravel extraction, one for brick clay extraction and one for coal and fireclay extraction. However, given the lack of any serious interest in the other sites identified, the Recordon Land was the only one recommended for allocation. This site is within the Stubbers Green Area of Search and has been proposed by Ibstock as an expansion site for Atlas Quarry in response to the second "call for sites" (2013). There is also a current planning application for expansion of the quarry onto this site, which includes an environmental statement on the likely effects. As there is no evidence that the constraints affecting the development cannot be overcome, and the development is likely to be viable and deliverable, it is proposed to allocate this site.	-	The combined effects of allocating all five of the potential site options identified would be negative, although there would be positive effects on meeting supply requirements for raw materials as it would provide some certainty over where mineral extraction is most likely to take place. The effects of mineral working on the surrounding area would vary, for example, three sites are near to residential areas where mineral extraction could have harmful effects on amenity and wellbeing of residents, four sites have poor or inadequate access and could therefore have harmful effects on transport networks without mitigation. Potential effects on environmental assets also vary, for example, there would be some impacts on the local landscape in all cases, one site is designated as a SINC and one site includes Grade 2 and Grade 3a agricultural land. Effects on other SA Objectives are uncertain, for example, effects on air quality and archaeology would need to be evaluated in each case, three sites are within groundwater source protection zones, and all five sites are in areas at risk from flooding.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Limiting the Impacts of Mineral Extraction Minerals Option 9c: Area/ Site- Specific Guidance	This Option has been chosen as it is considered impractical to include a phasing policy in the SAD (identified as an Option in the Issues & Options Report). However, the 'do nothing' option is also considered inappropriate, because the existing generic policies in the BCCS and NPPF are unlikely to capture all of the complex issues affecting mineral development sites in Walsall. The Preferred Option is therefore to provide prospective applicants with further guidance on each existing and proposed mineral extraction site and each proposed Area of Search, identifying the main constraints and issues that a planning application for mineral development will be expected to address.	++	Likely to have significant positive effect overall. While the inclusion of specific guidance in the SAD is not in itself likely to eliminate all of the negative effects of mineral extraction, it will at least make clear to applicants what the main issues, constraints and opportunities are, and the information they will be expected to provide with a planning application to demonstrate that the design of the working programme, the restoration programme and the proposed mitigation and enhancement measures is based on a full evaluation of all the relevant environmental, social and economic effects. The Option is likely to have positive effects on all SA Objectives, and significant positive effects on the amenity, health and wellbeing of local communities, provided that the guidance provided in the SAD for each site identifies the most significant issues and constraints that should be addressed in future planning applications relating to mineral extraction, to prevent, reduce or minimise harmful effects and maximise the potential for positive effects.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Transport Option 1: Safeguard Land	This option continues to safeguard land for transport purposes. The Issues and Options proposed to allocate and safeguard the current disused Walsall – Brownhills rail alignment, the DSDA Access Project and land for park and ride at Moxley. In Aldridge a choice was identified between safeguarding a site for industry or park and ride to serve a new station. The DSDA project is now underway and therefore does not need safeguarding. Park and Ride at the Aldridge site has been discounted in view of the fact that the prospect of rail services is not sufficiently advanced to warrant this, and it is still unclear where the station will be sited (though it is identified diagrammatically as part of the saved UDP Aldridge District Centre Inset plan). The Bradley Lane site will serve an existing tram line and is therefore identified, on slightly revised boundaries following a public consultation in 2015.	+	Option 1 is likely to have long—term positive effects on accessibility. The safeguarding of the Walsall Brownhills rail alignment would provide the capacity for a potential strategic rail route that could be used for rail and freight passengers, improving the national rail network. Under option 2, this would have been lost, and there would instead have been probable pressure to release this Green Belt corridor for housing, exacerbating the problems caused by peripheral development.
Option 2: Do Not Allocate Sites for Renewable Energy	The findings of the West Midlands Renewable Energy Capacity Study (2011) suggest that there is limited potential for generation of energy from renewable sources in Walsall on any scale. There is existing local plan policy and national policy guidance in place relating to the provision of energy infrastructure (including BCCS Policies CSP3, CSP4, CSP5, DEL1 and ENV7 and NPPF paragraphs 17, 93, 96 – 98), which can continue to be applied to any proposals that come forward during the plan period.	?	The overall effects of Option 2 are uncertain as it is unclear whether proposals would come forward in the absence of any site allocations. The extent to which it would help reduce CO2 emissions, increase production of energy from renewable and low carbon sources and have related benefits for the economy and transport is therefore also uncertain. However, this may be the only realistic option for the SAD and AAP, if no projects are currently being promoted in Walsall by potential service

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Utilities Infrastructure (continued)			providers, which could form the basis for site allocations. As with Option 1, which would involve allocating sites, effects on air quality are uncertain, as some biomass technologies (e.g. energy from waste) can generate harmful air pollutants, although it should be possible to control the effects through mitigation and regulation. Effects on biodiversity, heritage assets, amenity, ground conditions and the water environment are also uncertain, as the effects will depend on the sites that come forward, whether they are affected by these constraints and the effectiveness of existing local plan policies in preventing harmful effects.

6.6 AAP Options Appraisal – Overview of Results

Options Appraisal Outcomes and Justification for Preferred Options

The results of the Options Appraisal are set out in the Revised AAP Options Appraisal - Completed Matrix (January 2016). This presents the results of the appraisal of all the Options identified for the AAP throughout the plan preparation process. Options identified at the Issues & Options stage (April 2013) are in black text, new or refined Options identified at the Preferred Options stage (September 2015) are in blue text, and new or refined Options identified prior to Publication (March 2016) are in purple text.

The outcomes of the Options Appraisal are summarised in **Appendix I** of this report, which explains how the SA outcomes have influenced the choice of the Preferred Options for the AAP. The Appendix lists each Option identified, explains why it was selected, the outcome of the appraisal, and its current status, such as whether it has been rejected or taken forward as part of the Preferred Options for the AAP.

Table 29 below lists each of the Preferred Options for the AAP by topic. The table identifies the reasons for choosing each Option in preference to the other Options considered, the overall SA score, and the predicted effects.

Negative Effects of Preferred Options - Potential for Mitigation

The only Preferred Option for the AAP where negative effects have been identified are:

Cultural and Community Facilities Option 8 - No Provision for Outdoor Events

Overall effects of this option on the SA Objectives are likely to be negative, as it would reduce the likelihood of major outdoor events taking place in the Town Centre, and therefore there could be opportunity costs/ economic impacts from the loss of the potential increased footfall/ expenditure that such events bring, as well as forcing local communities to go elsewhere to less accessible locations for such events. It could also mean that outdoor public spaces not in the control of the Council are not available for events or are not protected against development. However this will be somewhat mitigated against by the

fact that there are already public spaces which could be used for public events. Also the proposed new Market has also been designed so that the stalls can be demounted allowing for The Bridge area to be used for public spaces and Policy AAPS3 reflects this by including a statement on the space being used for public events.

Table 29: Summary of Preferred Options for the AAP, Reasons for Choices, and Predicted Effects

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Town Centre Boundary Option 4 (Contracted and Expanded Boundary)	Allows for a realistic Town Centre boundary to be defined, to include areas that provide opportunities for new "town centre" development and to remove areas where there are no "town centre" uses, and which it is not appropriate to include in the Town Centre.	+	Effects on the SA Objectives are likely to be positive overall It would also help create conditions for expanding and improving the range of facilities and services available in the Strategic Centre, making it more attractive for residents and visitors, and therefore more competitive with other centres of a similar size and scale. As the Town Centre is a highly accessible location it may also reduce the distance people need to travel to shop, to work or for leisure. However, there is potential for increased visitors to generate more traffic and congestion and related air quality problems, which would need to be addressed through improved access for pedestrians and cyclists and more effective management of road traffic through the Town Centre. The Option would also not remove the potential for key facilities to become vulnerable to flood risk and other climate change effects, depending on where development would take place.
Primary Shopping Area (PSA) Option 3 (Contracted Boundary)	Reducing the PSA could result in fewer vacant units and a more compact retail offer.	+	Effects on SA Objectives are likely to be positive overall. Reducing the PSA may result in fewer vacant units and a more compact retail offer. This should result in the most accessible and vibrant Town Centre. This may, however, mean it is difficult to deliver the larger units required to meet modern retailers' demands. As a result, larger units may locate on the edge of the centre as the PSA cannot accommodate them which may mean some are less well linked, although there is potential for the AAP to identify well-located edge-of-centre

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Primary Shopping Area (PSA) (continued)		+	sites for convenience retailing or bulky goods to try and overcome this impact, by ensuring the most suitable locations are considered for development first in accordance with the sequential approach. A concentrated area for development may also result in more changes to the built environment and a impact on the centres character. However the AAP is supported by a characterisation study that aims to limit the negative impact on the centres character, and the plan also identifies area within the PSA which would benefit most from development avoiding the redevelopment of buildings with significant character.
Location of New Retail Option 1 (Park Street & St. Matthew's Quarter Only)	This would mean that shopping investment remains focussed and the heart of the shopping centre would be maintained. Part of Preferred Option, which is a combination of this Option and Option 4 - see Draft AAP Policies AAPS2 and AAPI5 and Policies Map	++	Effects on the SA Objectives are likely to be very positive overall, as concentrating development could result in a more attractive centre as investment is focussed and vacancy rates are reduced, and it will also encourage redevelopment of unattractive parts of the centre.
Location of New Retail Option 5: (Identify Appropriately Located Sites for Convenience and Bulky Goods Retailing Outside the PSA)	It is proposed to contract the PSA in order to concentrate investment, and to reflect the new lower retail floorspace targets. However, there are demands for convenience retailing and bulky goods that the Council is aware of. It would therefore be a reasonable option for the Council to identify preferred sites outside the PSA which have the potential to be well-linked to the PSA, which should be considered by applicants looking to bring forward retail development that cannot be accommodated in the PSA.	+	This Option would have positive effects overall, as it would ensure that investment that might otherwise be diverted towards other centres outside Walsall could be accommodated in appropriate locations on the edge of the PSA, where there are opportunities to link pedestrian and cycle routes with the retail core areas within the PSA.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Walsall Market Option 1 (The Bridge/ Bradford Street)	The work being undertaken on the location for a new market at the Issues & Options stage in 2013 indicated that this was the most appropriate location for the Market.	+	Effects of this option on the SA Objectives are likely to be positive overall, as the Bridge is considered the most accessible location for Walsall Market, and is a large area of public space, allowing a high quality environment to be created, to improve the attractiveness of the Market and Town Centre as a whole.
Location of New Offices Option 1 (Gigaport)	Gigaport has been a long term aspiration of the Council and the area has outline permission for office development.	+	Overall, the option is likely to have positive effects on the SA Objectives, as the Gigaport provides enough sites suitable for office development in an accessible and visible location. Through having a specific area to encourage office development it is hoped this will create a high quality businesses environment in the centre triggering further investment. There may be some increase in traffic and emissions along the Ring Road which already suffers from congestion. Some developments may need to be set away from the road to reduce the impact of air pollution on the scheme.
Current Office Stock Option 1 (Encourage Investment in Current Office Stock)	There are a number of office blocks that would benefit from investment however there have also been a number of proposals to redevelopment these for housing. The policy therefore looks to promote the investment in office and to deter the loss of offices in the centre.	+	Effects of this option on the SA Objectives are likely to be positive overall, as it could encourage investment in current office stock that would make the units more appealing to businesses attracting new businesses into the centre supporting the local economy. It could also have a positive impact on the environment of the centre as buildings are enhanced. However, there is no guarantee that the offices identified would be attractive to investors.

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Social Enterprise Option 2 (Identify Social Enterprise Zone) – include a policy in the AAP identifying a Social Enterprise Zone around the Goldmine Centre	This would support development/ clustering of new social enterprises around the Goldmine Centre in line with the Black Country LEP Social Enterprise Prospectus.	+	Effects of this option on the SA Objectives are likely to be positive overall, as it would encourage the growth of the current social enterprise at the Goldmine Centre, and would support further clustering of social enterprises focussing on different needs in the same area, offering more opportunities for young people to develop their skills and access jobs, or start their own businesses.
Industrial Uses Option 2 (Allow Incremental Change to Other Uses)	This is the "do minimum" option, representing the current situation, while also allowing for flexibility. It allows industry to be protected where appropriate without constraining the growth of the Town Centre and development of "town centre" uses.	+	Effects on the SA Objectives are likely to be positive overall, as this option would allow industry to be protected where appropriate, without constraining the growth of the Town Centre and development of "town centre" uses. However, there are some uncertainties about the effects, as it may put pressure on business owners to relocate, so the effects on the local economy would depend on a mechanism for relocating industry being found, otherwise there is a risk that industry and jobs could be lost or be relocated outside Walsall.
Leisure Facilities Option 2 (Retain and Invest in Gala Baths)	When the Issues & Options were identified in 2013 this was one of a number of options being considered for the Gala Baths.	++	This is likely to have very positive impacts on the SA Objectives overall as it would ensure that the Gala Baths stays open, accessible and viable for a longer period of time, and is likely to attract more users to the facility as well as providing opportunities to enhance the quality of the building.

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Cultural and Community Facilities Option 1 (Allocate Leather Museum Site)	When the Issues & Options were identified in 2013 the Council was considering a proposal to combine the Leather Museum and Walsall Museum with the Local History Centre, therefore this was an option that needed to be considered.	++	Overall effects on the SA Objectives are likely to be very positive as this option would help to retain an important historic asset in its existing location and setting, and would also provide an enhanced community facility, bringing similar uses together within the Town Centre. There are some uncertainties about the future uses of the buildings to be vacated - while the area vacated by the Walsall Museum is part of the Central Library and could therefore be re-used by the Library or as Council offices, there is there is some uncertainty about what will happen to the existing Local History Centre building.
Cultural and Community Facilities Option 4 (Promote Existing Performance Venues)	There are a number of facilities in the centre which could be made more use off and the AAP could look to promote this approach.	++	Overall effects on SA Objectives are likely to be very positive, as while this option would not add to the provision for live performance venues in the Town Centre, it is likely to enhance the role of existing facilities and may help to make them more viable and secure their future. As these facilities are in a highly accessible location, it would also have wider benefits for local communities.
Cultural and Community Facilities Option 5 (No Provision for Performance Venues)	Such as use would be suitable in the town centre and it is possible that a proposal would come forward.	?	Overall effects on SA Objectives are uncertain, as the Council would have reduced control over locations and phasing, however the negative impacts of allocating land, such as discouraging other types of "town centre" development that would benefit the centre, would be avoided.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Cultural and Community Facilities Option 6 (Provide Performance Venues in Mixed Use Schemes)	There are a number of locations where this is possible use along with other centre uses.	++	Overall effects on SA Objectives are uncertain, as the Council would have reduced control over locations and phasing, however the negative impacts of allocating land, such as discouraging other types of "town centre" development that would benefit the centre, would be avoided.
Cultural and Community Facilities Option 8 (No Provision for Outdoor Events)	There are spaces which already provide opportunities for public events without a formal allocation.		Overall effects of this option on the SA Objectives are likely to be negative, as it would reduce the likelihood of major outdoor events taking place in the Town Centre, and therefore there could be opportunity costs/ economic impacts from the loss of the potential increased footfall/ expenditure that such events bring, as well as forcing local communities to go elsewhere to less accessible locations for such events. It could also mean that outdoor public spaces not in the control of the Council are not available for events or are not protected against development.
Evening Economy Option 3 (Specific Locations for Development)	This is a variation on Option 1 and would involve identifying specific locations in the Town Centre which could be particularly suitable for development of new evening economy establishments, rather than "zones," for example, Walsall Waterfront.	?	Overall effects on the SA Objectives are uncertain. It is likely to have many of the benefits of Option 1 in terms of synergies from co-location of evening economy establishments with other complementary leisure uses. By identifying specific locations rather than wider "zones," depending on the choice of location, there is also less risk of adverse impacts on other land uses which are not complementary to the evening economy, such as housing.

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Overnight Accommodation Option 3 (Specific Locations for Development)	This is a variation on Option 1 and would involve identifying specific locations in the Town Centre which are considered suitable for a new hotel development, rather than "zones."	+	Overall effects of this option on the SA Objectives would be very similar to Option 1 and would be positive, as new hotel development is likely to improve the vitality and viability of the Town Centre. Identifying specific locations or sites where hotel development is encouraged would also reduce the likelihood of land use conflicts or competition with other "town centre" land uses. This option could also have wider benefits for visitors and local communities, as hotels and associated restaurants and function spaces could be steered towards locations near to public transport hubs.
Walsall Canal Option 1 (Development Required to Enhance Canalside Environment)	The Walsall Canal is an important asset to Walsall Town Centre and should be promoted and protected as much as possible. It is acknowledged that there is existing policy guidance in place and that much of the canalside environment in the Town Centre has already been developed. However, this option would allow higher standards of design to be set in the AAP for further new developments adjacent to the Canal, requiring them to create attractive routes and spaces.	+	Effects on the SA Objectives are likely to be positive overall. Providing more specific guidance in the AAP would allow the Council more control over any further development surrounding the Canal, so it is more likely to be attractive, well designed, and accessible for all members of the community. The Canal is designated as a Conservation Area and providing guidance will also ensure that all new canalside development respects the character and appearance of the Conservation Area as well as enhancing the wider townscape, and contributing appropriately towards wider walking, cycling and environmental networks.

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Location of Leisure Option 1 (Waterfront Only)	Waterfront is an attractive location for leisure development. Some leisure development has already taken place or is in the pipeline, and there is potential to capitalise on this and to develop it as a key leisure destination, by identifying Waterfront as the main location for large-scale leisure development in the Town Centre.	+	Effects on SA Objectives are likely to be positive overall, because the Waterfront area is near to the PSA and near to the railway station, so concentrating leisure uses in this area will complement the range of land uses already available in the vicinity, having positive effects on the vitality and viability of the Town Centre. It would also have wider benefits for visitors and local communities, as it would mean that new leisure developments would be developed in the most accessible location in Walsall, near to public transport hubs.
Housing Option 1 (New Housing Allocations)	There are sites which may be most suitable for residential.	?	Overall effects on SA Objectives are uncertain, as it could affect delivery of targets for retail and office floorspace or delivery of other "town centre" uses, depending on which sites are allocated. Provision of further housing in the Town Centre would help to improve its vitality and viability as well as providing homes in a highly accessible location where residents would have access to shops, jobs and a range of other amenities as well as to public transport networks. By allocating specific sites, it is possible to minimise harmful effects on occupiers from the surrounding environment, by avoiding sites at risk from flooding and sites exposed to noise or air pollution, and by requiring developers to provide a good standard of design and amenity.

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Housing Option 2 (Provide Housing through Mixed Use Schemes Only)	Residential is a suitable use as part of some mixed use schemes and can help with deliverability.	+	Overall effects on the SA Objectives would be similar to Option 1 and would generally be positive, because this option is likely to deliver more new homes in areas where it would not compromise delivery of "town centre" developments. As the mixed use sites would be allocated in the AAP, it would be possible to minimise harmful effects on occupiers from the surrounding environment, by avoiding sites at risk from flooding and sites exposed to noise or air pollution, and by requiring developers to provide a good standard of design and amenity.
Housing Option 3 (Providing Housing through LOTS & Other Vacant Floorspace)	There are a number or vacant or underused buildings within the centre which could be promoted for residential.	+	Effects on the SA Objectives are likely to be positive overall, as this would not only deliver new homes and support the vitality and viability of the Town Centre, but could also support retention of existing buildings and have a positive effect on local character and townscape. However, there are some uncertainties if housing is provided in areas where no social infrastructure exists. There may also be impacts upon residential amenity from neighbouring "town centre" uses and exposure to existing environmental constraints, such as flood risk and air pollution, if any vacant building is allowed to be converted to housing.

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Residential Environments Option 1 (Minimum Standards for Residential Environments)	If residential development is promoted in the Town Centre, it is important that it provides an adequate living environment and standard of amenity, and further guidance in the AAP could help to achieve this.	+	Overall effects on SA Objectives are likely to be positive, as requiring developers to provide safe and attractive residential environments is likely to attract more people to live in the Town Centre, and is also likely to enhance the townscape and attractiveness of the centre. However, such requirements can increase the costs of a residential development which could affect the viability of residential schemes.
Education and Health Option 1 (Allocate Land for Expansion of Existing Education and Health Facilities)	There are existing facilities in and around the Town Centre, such as the Manor Hospital and Walsall College which may need space to grow and expand in the future.	+	Effects on the SA Objectives would be positive overall, as the Town Centre would benefit socially and economically from a strengthened health and education sector. However allocating sites specifically for education could impact on the ability to deliver the BCCS floor space targets for offices, particularly if there is no demand for expansion and land remains undeveloped as a result.
Education and Health Option 3 (Protect and Promote Current Health Care Facilities)	There are a number of healthcare facilities in the Town Centre that should be protected, and there may also be a future need for new health and social care facilities in the Town Centre which should be supported. Also the proximity of the Manor Hospital to the Town Centre is a positive advantage which should be built on, where possible.	+	Effects of this option on the SA Objectives would be positive overall, as it would safeguard existing facilities and would provide the potential for them to be improved and expanded if there is a need. However, there may be some issues around location, as health care facilities are "sensitive receptors" and if they are already exposed to air pollution sources, allowing expansion could increase exposure unless the effects are mitigated in some way. There may also be impacts on the highway network, depending on the scale of the proposal and its location, for example, whether it is likely to generate increased trips by car or is well related to public transport.

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Community Facilities Option 3 (The AAP does not allocates land for community facilities but provides criteria and identifies a priority site)	The Council received no consultation responses in support of the allocation from community groups that would use the facility and there has been no evidence made available to show there is need or demand for such a facility. Therefore the deliverability of a community facility is uncertain and allocating a site for this use may mean the site remains undeveloped for some time and that the other uses needed on site are jeopardised.	?	Effects on the SA Objectives would be uncertain, as by not allocating a site for a new community facility in the Town Centre, there is a risk that such a facility could be developed in a less central and less accessible location. Also, not allocating a site may make the delivery of a "community hub" less viable, because of competition from other "town centre" uses and without a site, it would be more difficult for the providers to secure funding. However the identification of a priority site and the use of criteria reduce the risk of a community facility being developed in an inaccessible location and still shows the Council is supportive of such a use at the site which should help with delivery.
Character Option 2 (Encourage Development in Places of Character	The Walsall Town Centre Characterisation Study (2015) has provided up-to-date evidence on the character of different parts of the Town Centre, and the positive aspects of local character that it would be desirable to develop and enhance in each area through new developments. It would be possible to include a policy in the AAP requiring new developments to relate positively to local character in each of the character areas of the Town Centre.	++	Effects of this approach on SA Objectives towards the conservation of heritage assets and townscape quality are likely to be very positive, as it would support well designed new buildings which reinforce existing character in a positive way, as well as developments that would retain and conserve existing buildings important for local character. While this could have similar effects to Option 1 in terms of discouraging development in certain areas because of the restrictions and added costs, the approach is more flexible, and would allow large scale new "town centre" developments to take place in appropriate locations, where they do not detract from local character.

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Conservation Option 4 (Improve Interpretation of Historic Environment)	Heritage is often seen as being specialist, elitist and inaccessible to many people, so this option would look to address this issue by providing further information and guidance on the historic environment of the Town Centre and heritage assets which are of particular importance.	+	The overall effects are likely to be positive, as heritage is often seen as being specialist, elitist and inaccessible to many people, so helping people to understand what is important about heritage assets in the Town Centre and why they should be protected could help with their protection. However, reaching out to all members of the community may be difficult.
Conservation Option 5 (Rely on Existing Policy and Legislation)	Current legislation and local plan policy already offers the historic environment protection, but without further work through the AAP, further enhancement might not be possible and development may not have full regard to the key features of importance to local character in the Town Centre.	?	The effects are uncertain, as while current policy and legislation already offers the historic environment some protection, without further work through the AAP to identify what the priorities are and how they should be addressed, conserving the main heritage assets may be more difficult and opportunities for further improvements and enhancements are likely to be lost.
Protected Views Option 1 (Protect Locally Important Views)	A policy could be included in the AAP which identifies locally important views that will be protected, to help to protect the character of the Town Centre. The objective would be to prevent further damage to these views, either by blocking or unacceptably imposing or by creating an intrusive element in the view's foreground or middle ground, and clarify development height thresholds where appropriate.	+	The effects should be positive as Where views are protected, the policy would seek to prevent undue damage to the view, either by blocking or unacceptably imposing or by creating an intrusive element in the view's foreground or middle ground. This could, however, impact upon scheme viability.

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Design Option 3 (Design Standards for Buildings in Key Locations)	It would be possible for the AAP to identify specific standards for design quality, enhancement of local character, and enhancement of the environment and image of the Town Centre for key buildings and sites.	?	Such buildings would set a standard for high quality design across the town, enhancing the character, environment and image of the town centre. Requiring exemplar design may mean refusing applications which do not meet these standards. This could impact on the regeneration of the centre and the economy of Walsall overall. The impact is therefore uncertain.
Design Option 4 (Apply BCCS Renewable Energy Requirements Only)	As there is no evidence of significant take up of renewable and low carbon energy technologies in the Town Centre, it would be a reasonable option to continue to rely on the existing policy framework to assess whether new development proposals have had sufficient regard to this.	0	Overall neutral impact. No further investment in renewable energy is made above the current levels required, this may mean the centre is less sustainable and there are more negative impacts on the environment. However further requirements in the centre could mean developments locate elsewhere meaning there is more car usage and a negative impact in terms of emissions.
Public Realm Option 1 (Identify Priority Areas for Improvement)	The Council has already undertaken some work on the need for public realm improvements in the Town Centre, and this could be built on by including appropriate guidance in the AAP on which areas will be a priority for improvement.	++	Very positive - The environment of particular areas well-used by the public is improved which would enhance the experience and image of the town centre. A high quality environment is also important in attracting further investment into the town centre. However such improvements can be costly. There would also be ongoing resource implications for the maintenance of these areas.
Environmental Option 1 (Identify Assets Requiring Improvement)	This would help to give further protection to environmental assets in the Town Centre, and would also identify opportunities for improvement and enhancement of the environmental network through new development.	++	Very positive - This would create an improved environment, provide certainty to developers, but may deter some investors due to additional requirements

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Environmental Option 3 (Set Requirements for New Developments to Deliver Environmental Infrastructure)	Existing local plan policy may not provide sufficient justification on its own to secure green infrastructure through new developments in the Town Centre – the AAP could include further guidance on the circumstances/ sites where this will be sought.	++	Very positive - This would help to deliver green infrastructure in the centre which will have a positive impact in the environment and reduce emissions. A greener centre could attract further investment and mean that the community uses the centre more.
Urban Open Space Option 2 (Allocate Urban Open Space adjacent to Art Gallery)	The allocation of these areas of green space for protection would enhance the environment around Church Hill and in the Waterfront area, both of which are important residential areas. The Waterfront area is also identified as an important development area so it is important to have some green space in this area to maintain its quality. Safeguarding the open space in this area would also contribute towards the development of the green corridor along the Canal and improve linkages to wider ecological and greenway networks.	++	Very positive - This would help to deliver green infrastructure in the centre which will have a positive impact in the environment and reduce emissions. A greener centre could attract further investment and mean that the community uses the centre more. This would prevent the site being developed for a town centre use which may have more direct economic benefits.
Pedestrian Movement Option 1 (Further Requirements and Guidance on Pedestrian Movement)	Existing local plan policy is not specific about existing pedestrian linkages and does not identify the areas where improvements are needed in the Town Centre. If this guidance was provided in the AAP it would ensure that new developments take this into account. Also, identifying specific locations where improvements to linkages are needed in the Town Centre will provide more certainty and help to secure their delivery.	++	Very positive - New development is well linked but this may place increased costs on developers. Locations where improvements to linkages are needed are identified helping to secure their delivery. This improves schemes vitality and also increases the attractiveness of visitors to the centre. Better connections may also mean people use public transport more making the centre more sustainable.

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Cycling Option 1 (Protection of Cycle Routes and Further Guidance on Enhancement)	There are number of cycle routes in the Town Centre which could be protected in the AAP, and improvements to cycle routes that would benefit the centre.	++	Very positive - The current cycle route is shown on the policies map and protected. Greenways are identified to improve links to open space and other areas including the hospital. New Greenways and other paths that need improving are identified. Many of these routes are used by pedestrians too so improvements will be for those access the centre on foot as well. This will help link the centre and encourage more sustainable transport which has environmental and health impacts. The protection of the canal footpaths for cycle routes also protects the canals historic environment and ensures it continues to provide a positive environment for communities and the wildlife.
Public Transport Option 3 (Expansion of Bradford Place)	Bradford Place is running at capacity and would benefit from expansion	+	Positive - Creating extra capacity will improve passenger experience, safety and the reliability of services, but would have implications for neighbouring land uses.
Walsall Rail Station Option 1 (Expand Walsall Railway Station)	There are proposals for a rapid transit scheme that would need a new platform at the railway station.	++	Very positive – by creating extra capacity it will mean Walsall is better linked and more attractive to visitors and investors. This will impact positively on the economic growth prospects of the Borough, enabling local rail services to be improved and increase the possibility of attracting national rail services. This could also reduce car usage with benefits to the environment and road congestion. The car park at station street would be lost and there may be some impact on the character of Station Street which does have some buildings of strong character,

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Walsall Rail Station (continued)		?	although improvements to the station may be the catalyst needed for improvements to Station Street overall. There may also be implications for the Saddler's Shopping Centre.
Taxis Option 2 (No Additional Taxi Ranks)	The number and location of taxi ranks is determined outside of the plan making process.	?	Uncertain - The current level of taxis remain and any additional ranks are decided outside of the plan making process. Uncertain impact as taxi will meet demand so it's unlikely to impact on the level of service overall.
Coach Facilities Option 2 (No Provision for Coach Stopping Facilities)	The current stopping location remains in use	?	Uncertain - The current stopping arrangements would remain and any future issues would be addressed outside of the plan making process. This would not mean that current levels are reduced by may mean further operators are deterred from the centre.
Road Network Option 3 (No Action to Reduce Vehicle Emissions)	The road network leading to the Town Centre, especially along the Ring Road, suffers from congestion, which is also having effects on air quality. If nothing is done to address this it could deter future investment in the Town Centre. The existing transport strategy for Walsall in the BCCS does not identify improvements to the road network in the Town Centre as a priority, and no projects are identified in the current West Midlands Local Transport Plan.	?	Uncertain - Improvements are identified which will help secure any funding available. By improving the road network more development could be attracted to the centre especially within the Gigaport area. The better moving the traffic is the less impact on air pollution there is along the corridor although there may be an increase in car emissions overall.

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Road Network Option 4 (Identify Roads Requiring Investment)	There is an existing transport strategy in place for Walsall in the BCCS, and a number of improvement projects are programmed in the West Midlands Local Transport Plan, although these do not currently include any road improvements in Walsall Town Centre. It is possible that such improvement schemes could come forward outside of the plan making process, such as through the current review of the West Midlands Local Transport Plan.	?	Uncertain - Any improvements are undertaken as and when identified. This may mean they are not delivered which could mean that the situation of the road network gets worse resulting in less development being attracted to Walsall with sites remaining vacant and a negative impact on the economy. Also the congestion result in a build up of air pollution along the ring road which has a negative impact on the environment of centre and possible health implications.
Car Parking Option 1 (Allocate Land for New "Super" Car Parks)	There is a need for more well-located, safe and accessible car parking in the Town Centre.	+	Positive - This will enable 'super' car parks to support investment anticipated in the town centre, making it more attractive to a wider range of potential users. It will also improve the strategic highway network and customer safety.
Car Parking Option 2 (Rationalise Current Car Park Provision)	There are some car parks that could be redeveloped as they are not well used and are in less accessible locations.	?	Uncertain - whilst this may result in some under-utilised car parks being developed for other purposes, this will not assist the anticipated investment in the town centre and may deter some potential users.
Car Parking Option 4 (Standards for Off- Street Car Parking Charges)	The Council has an approach which is not implemented consistently by all car parks, which results in some car parks not meeting the needs of Town Centre visitors, impacting on the health of the centre.	0	Neutral - This would result in a more attractive car parking offer to customers and businesses. Controlling the price may result in a loss of competition which may mean some car parks chose to close. Also means that car parking that is for developments, also serves the Town Centre as a whole, and that linked trips are encouraged supporting the centre economy.

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Approach Option 2 (Vision and Land Use Policies for "Big Three" and Park Street)	There is already an established approach in the UDP and BCCS of promoting particular types of land uses in certain locations in the Town Centre, and the AAP could continue and further develop this approach.	+	Positive - These sites are promoted as the main development opportunities in the town centre. Each site has a clear vision for the types of uses which are acceptable, and other uses will be discouraged. Focusing on specific uses should result in a stronger town centre, with developments only being delivered in the locations which are most appropriate. This would allow clarity on how the BCCS targets would be met. However refusing all alternative uses may mean that investment is not forthcoming and sites may remain undeveloped for longer.
Old Square Option 1 (No Land Use Change)	This would help to deliver the BCCS targets for retail floor space and protect the core of the Town Centre.	++	Very positive - This will help to deliver the targets for retail floor space and protect the core of the town centre. It may mean that the units remain vacant for longer but a flexible approach is already applied to alternative uses within the centre will minimising this risk.
Old Square Option 2 (Expand/ Redevelop with Larger Retail Units)	This could help to attract retailers seeking larger unit sizes which are not generally available elsewhere in the Town Centre, therefore enhancing the overall shopping experience and vitality of the Town Centre.	++	Very positive - Proposed to attract retailers seeking larger unit sizes which are not generally available elsewhere in the town centre, therefore enhancing the overall shopping experience and vitality of the town centre.
Shannon's Mill Option 1 (No Land Use Change to Front Site)	This would continue the current approach towards the site.	+	Positive - This would provide a retail development opportunity close to the current retail offer. This would help deliver the retail floor space but could stretch the retail offer across a larger area resulting in vacancies in the heart of the centre as there may not be enough retail demand to support the number of units. This may mean the site remain undeveloped for some time as there could be limited demand for retail on the site

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Shannon's Mill Option 2 (Identify Rear Site as Mixed Use Development Opportunity)	The site has remained undeveloped for some time with limited retailer interest. Identifying other potential land uses may therefore be the best way to bring the site forward.	+	Positive - This would allow the front end to be used as retail whilst the rear is developed for another use. This has the potential to maximise the site potential but would mean that the rear couldn't be developed for retail, this may restrict the size of retail development that could fit on the site
Shannon's Mill Option 3 (Identify Whole Site as Mixed Use Development Opportunity)	Shannon's Mill is on the edge of the Primary Shopping Area and there has been little retail interest in the site over recent years, meaning that other potential uses for the site need to be considered.	+	Positive - This would allow for more flexibility and could result in the site coming forward faster. Some uses may support the surrounding retail uses such as leisure or residential. It could however result in a retail opportunity site being lost
Gigaport Option 1 (Identify as Walsall's Main Business/ Office Development Location)	The Gigaport has been identified for some time as the preferred location for office development in the Town Centre. This area has the potential to develop as a business district where offices can locate close to each other in an attractive planned environment.	+	Positive - Gigaport provides enough sites suitable for office development in an accessible and visible location. Through having a specific area to encourage office development it is hoped this will create a high quality businesses environment in the centre triggering further investment. There may be some increase in traffic along the Ring Road which already suffers from congestion and some increase in emissions in the area. Some developments may need to be set away from the road to reduce the impact of air quality on the scheme.
Gigaport Option 3 (Identify Land Adjacent to Littleton Street as Phase One)	These sites are the most prominent sites in the Town Centre, and their successful delivery could provide a catalyst for further investment in office developments in the same area	+	Positive - These sites are the most prominent and their successful delivery will provide impetus for further investment. However focusing on these sites could lead to other less prominent sites remaining undeveloped for longer periods of time.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Waterfront North Option 1 (Allocate for Leisure Uses)	When the Issues & Options were identified in 2013 there was a proposal for a cinema and other leisure uses at this site.	++	Very positive - Waterfront North would be promoted as the key opportunity for strategic leisure developments. The area is a good location for leisure facilities, in close proximity to the Art Gallery, with the potential for an enhanced canal side environment, and good public transport links. However dismissing other investment on this site may mean that some investment is not secured in the town centre.
Waterfront Lex Option 3 (Allocate for Any Town Centre Uses/ Mixed Uses)	The site is potentially suitable for a variety of land uses including housing or "town centre" uses.	+	Positive - The maximum benefit of the canal side frontage may not be realised, but a mixed use scheme may ensure deliverability of the site. Flexibility in the approach to uses should help delivery the site.
Park Street Option 1 (Allocate Park Street Area as Walsall's Main Retail Development Location)	Park Street is the main shopping street in the Town Centre where most of the main retail outlets are located, and is the core of the Primary Shopping Area	++	Very positive - Retail investment is focused on Park Street and the retail heart of the town is maintained. Some redevelopment of units may be required as without this it could be hard to attract investment, particularly from retailers requiring larger stores
Park Street Option 2 (Allocate Park Place and Saddlers' Centre as Walsall's Main Retail Development Location)	These two shopping centres are the main sites in the Park Street area with potential for new retail development. Both centres have a number of vacant units and there is potential for redevelopment/ reconfiguration to provide new retail opportunities.	?	Uncertain - Retail investment is still promoted in the Park Street area, but is focused on the two shopping centres rather than the street itself. This may offer greater opportunity to create larger units which are needed to attract retailers, but the smaller units on Park Street may become vacant.

Preferred Options	Reasons for Choosing	Overall SA Score	Predicted Effects
Secondary Sites Option 1 (Allocate Secondary Sites as Development Opportunities)	There are a number of sites outside the "Big Three" and Park Street which would be suitable for investment and which would benefit the town centre if developed	+	Positive - A number of sites which are development opportunities are identified as development opportunities. This could conflict with the priorities but the policy can mitigate against this by requirements proposals to complement the regeneration strategy in the AAP. Identifying the sites may help them come forward and attract further investment in the centre.
Flood Risk Management Option 2 (Site-by-Site Approach to Water Management)	It is possible to manage flood risk on a site-by-site basis by applying existing national policy guidance and local plan policies.	+	Positive - Developers would need to provide drainage on a site by site basis, limiting the potential for more sustainable and innovative solutions to water management given site constraints including the land available for such solutions. There would be little benefit to the operation of the overall drainage network.
Constraints Option 1 (Policy on Development Constraints in the Town Centre)	There are a number of development constraints in the Town Centre and these can have a direct impact on the viability of schemes. It may be helpful for the AAP to identify these and provide guidance to developers on the main priorities and requirements.	+	Positive - A positive approach towards understanding the constraints and working with developers to overcome them will help with delivery.

6.7 Equality Impact Assessment – Key Issues for SAD and AAP

As is explained above (Chapter 2, Section 2.2), the SA is an integrated appraisal which combines the requirements for Equality Impact Assessment (EqIA). There is a specific SA Objective on Equality and Diversity (SA7) which has been used to evaluate the potential effects of each Option. These effects have been recorded separately in the SA Matrices for the Revised Options Appraisals (January 2016). Options identified as having potentially significant positive or negative effects on equality and diversity are summarised below.

Equality and Diversity - Key Issues for the SAD

The Preferred Options for the SAD seek to allocate sites for housing and other developments that are used by large numbers of people in accessible locations to meet identified needs from all sections of the community. Options that would involve developments in locations likely to be inaccessible to those without access to a private car, such as Housing Option 3 (Greenfield Sites), have been rejected.

The Preferred Option for Gypsies, Travellers and Travelling Show-people includes allocating specific sites for Gypsies and Travellers (GTTS Option 4), and including policy criteria in the SAD to assess any proposals that may come forward for other sites for these groups. The Preferred Option for Affordable and Special Needs Housing is to include a specific policy in the SAD to encourage specialist housing, including that for the elderly and people with disabilities, in and close to centres and locations with good public transport access.

Equality and Diversity – Key Issues for the AAP

Overall most of the AAP Options are likely to have positive equality and diversity effects. There were however some Options which scored negatively, are these have been addressed as follows.

Leisure Facilities Option 1 - the Council not investing in Gala Baths

This Option was considered likely to have negative effect on equality and diversity, as the Town Centre is the most accessible location for leisure facilities, if the Baths has to close down or is unsuitable for use due to lack of investment then this reduces residents' ability to

access leisure facilities. This Option was therefore rejected and Gala baths is to be protected through the AAP.

Leisure Facilities Option 5 – no provision for leisure facilities in the Town Centre

This Option was considered likely to have negative effect on equality and diversity as the Town Centre is the most accessible location for leisure facilities and should be the focus of the Council's leisure provision. Lack of Town Centre provision would be likely to reduce residents' ability to access fitness facilities, which will impact disproportionately on those who do not have access to a private car and may not be able to travel to alternative facilities in less accessible locations. The Option was therefore rejected, and Gala baths is to be protected through the AAP, and there are also a number of development opportunities identified which could accommodate further leisure facilities.

6.8 Health Impact Assessment – Key Issues for SAD and AAP

As is explained above (Chapter 2, Section 2.2), the SA is an integrated appraisal which combines the requirements for Health Impact Assessment (HIA). There is a specific SA Objective on Health and Wellbeing (SA8) which has been used to evaluate the potential effects of each Option. These effects have been recorded separately in the SA Matrices for the Revised Options Appraisal (January 2016). Options identified as having potentially significant positive or negative effects on health and wellbeing are summarised below.

Health and Wellbeing – Key Issues for the SAD

As noted above, the Preferred Options for the SAD are to allocate sites for housing and other uses that generate large numbers of visitors or users such as 'town centre' uses to accessible locations (for example, Housing Option 4, Affordable and Special Needs Housing Option 3, and Local Centres Options 2 and 4). This means that the SAD will promote development in locations that can be reached easily by walking or cycling as well as by public transport.

The SAD also seeks to safeguard most existing Open Space, especially in areas where there is an identified shortfall. None of the Options for Open Space, including the Preferred Option (Option 5), would have negative effects on health and wellbeing. Whilst some open space has been allocated for other uses, potentially exacerbating some existing deficiencies,

the disposal of low value open space offering limited functions in order to provide jobs and housing is considered not to adversely affect health and well-being. The open space sites proposed to be redeveloped with other uses under the Preferred Option are generally of poor quality and have limited benefits for visual amenity and recreation, and the borough's extensive network of open space will ensure that adequate provision is maintained.

The Preferred Options also seek to avoid allocating sites for housing and other sensitive uses such as Gypsy and Traveller sites in locations where there is a risk to the health or well-being of potential residents because of poor air quality, noise, flood risk or other factors (see Chapter 4, Figures 16, 17 and 19).

No evidence has been forthcoming of any need to allocate new sites for health or similar facilities and so the Preferred Option is not to include any specific policies in the SAD relating to these (Community and Leisure Facilities Option 1). However, the existing BCCS Policy HOU5 already provides a policy relating to the location of such facilities.

Health and Wellbeing – Key Issues for the AAP

Overall most of the AAP Options are likely to have positive or neutral effects on health and wellbeing. There were however some Options where effects were uncertain or potentially negative, are these have been addressed as follows.

Leisure Facilities Option 1 - the Council not investing in Gala Baths

This Option is likely to have a negative effect overall on health and well-being - whilst in the short term the service provided by the Council for leisure in the town centre would not change, it is anticipated that without further investment in the near future that the Baths would fall into disrepair and would no longer be viable for the Council to run. If the Council had to close its only town centre based leisure facility this would be very negative on the health and well-being of Walsall's residents. The Baths would also be unlikely to attract any new users to the facilities without further investment. The Option was therefore rejected and Gala baths is to be protected through the AAP.

Leisure Facilities Option 5 – no provision for leisure facilities in the Town Centre

This Option is likely to have very negative impacts on health and well-being, as closure of the Council's main Town Centre fitness offer would be likely to reduce residents' ability to

undertake exercise. The Option was therefore rejected and Gala baths is to be protected through the AAP, there are also a number of development opportunities identified which could accommodate further leisure facilities.

Air Pollution - the AAP recognises the effects of air pollution but sets no standards or process by which to reduce emissions within the Town Centre.

Air pollution is an important issue in the Town Centre (see Chapter 4, Figure 16), as the Ring Road and other parts of the centre are affected by high levels of nitrogen dioxide (NO2), a harmful pollutant, the main cause of which is road traffic. It is considered that reductions in road traffic emissions are best addressed in other ways than through the AAP and an air quality SPD has been produced by the Council jointly with the other Black Country Authorities to address this issue throughout the Black Country, which should have more of a positive impact than measures proposed for Walsall Town Centre in isolation.

6.9 Conclusions - Key Issues for Preferred Options

The main conclusions of the Options Appraisal carried out at the Issues & Options stage in 2013 were that most Options identified for the SAD and AAP would have positive or neutral effects. In general, the Options that scored positively against the SA Objectives were Options that promoted patterns of land use and development in accordance with the BCCS spatial strategy, and those that scored negatively were promoting more dispersed patterns of development, which are likely to increase journeys and dependence on the private car.

The results of the Revised Options Appraisal carried out in 2015 identified the same general trends for positive effects where Options accord with the BCCS spatial strategy, and negative effects where they do not. The outcomes of the Options Appraisal have strongly influenced the selection of the Preferred Options for both plans and confirm that the general approach is the most sustainable, taking into account all relevant considerations. The appraisal has also confirmed that most of the Preferred Options identified for the SAD and AAP are likely to have positive or neutral effects on the SA Objectives.

Where potential negative effects were identified (see 6.5 and 6.6 above), measures to mitigate these effects have been identified where feasible (see Tables 28 and 29). The predicted effects of the Preferred Options identified in this Chapter were taken into account at the next stage in the preparation of the plans, the development of the final SAD and AAP

Policies at the beginning of 2016. The outcomes of the appraisal of the SAD and AAP Policies is summarised in the following chapters of this report (Chapters 7 and 8).