

## **9. Sustainability Appraisal of the Pre Submission Modifications for the SAD and AAP**

### **9.1 Changes to Options**

There have been two options added in relation to the approach taken in respect of SAD policies EN4 and M9 (MP5: Brownhills), as both has the potential to adversely impact Cannock Extension Canal SAC. Neither option featured at the Publication Draft Plan Stage of the SAD, but it was later considered helpful to include them as a means of testing the alternative to including these projects and developments in the SAD. Also, an additional option to those which were previously identified in relation to mitigating the potential impact of residential development to the Cannock Chase SAC was considered.

The policies and allocations contained within the pre submission modifications for the SAD and AAP were shaped by the appraisal of these overarching options. The appraisal also provides explanation for the selection of each approach taken in respect of complying with the Habitats Regulations.

With the exception of modifications made in relation to the above, none of the other modifications proposed for the SAD and AAP involve changes to the options considered at the Draft Plan Stage of either document Preferred Options. The modifications only affect certain sites to be allocated, either by adding assets or constraints that affect the sites, amending the site boundaries or, in a small number of cases, changing or deleting the uses proposed for the sites. These modifications do not have a significant effect on any policy as a whole.

Further details can be found in SA Report Appendices H and Q, and Revised SAD Options Appraisal - Completed Matrix (July 2016)

No new options or change to the Preferred Options have been identified for the Town Centre AAP.

### **9.2 Summary of Pre-Submission Main Modifications**

A full version of the proposed Pre-Submission Main Modifications is available on our website. Tables 9.1 and 9.2 below provide a summary of the Main Modifications for both the documents. Appendix Q provides a more detailed breakdown of each of the Main Modifications.

**Table 9.1: Summary of Pre-Submission Main Modifications to Walsall SAD with Implications for SA**

Policies/ Sections Affected	Subject	Summary of Modifications
<b>Section 2.3</b>	<b>Assets and Constraints</b>	<p>The list of ‘Assets’ and ‘Constraints’, and the identification of which ones relate to particular sites, has to be as accurate and complete as possible to ensure that these are identified at an early stage in the design of a new development, so that potential harmful effects can be mitigated. The Modifications have involved checking that all relevant Assets and Constraints have been identified for each site to be allocated, and amending the relevant policies where any have been missed. Further Assets and Constraints have also been added to Section 2.3 of the SAD, including the Darlaston Enterprise Zone and the Local Development Order, and permitted minerals sites.</p> <p>As a result, several sites proposed to be allocated for housing or industry have been amended or omitted, and notes have also been added to a number of sites identifying the need to take account of flood risk. These amendments are described in more detail in the housing and industry policies below.</p>
<b>HC1</b>	<b>Housing Sites</b>	<p>Several sites have been amended or deleted to take account of assets and constraints on or adjacent to them. These include:</p> <p>HO11 (Somerford Place) and HO16 (New Road): These two sites in Willenhall have been identified as lying in a flood zone, although both are defended by the River Tame culvert. HO11 is also identified as a potential site for showpeople under policy HC4.</p> <p>HO58 (Walsall Road, Walsall Wood): This site (together with the adjacent consider for release industry site IN6) has been deleted as a housing allocation because of the proximity to the permitted minerals site at Highfields North (MP9)</p> <p>HO303 (Heathfield Lane, Darlaston): Site area has been reduced to exclude the Ward’s Pool SINC from the developable area. This reduces the site capacity to 188 dwellings</p> <p>HO305 (Cricket Close, Walsall): Area within flood zone excluded from the developable area, reducing the site capacity to 42 dwellings</p>
<b>HC4</b>	<b>Provision for Gypsies, Travellers and Travelling</b>	<p>As with general housing sites, details of assets and constraints have been updated for several sites, including details of flood risk and mineral safeguarding</p>

	<b>Showpeople</b>	
<b>IND1 – IND5</b>	<b>Industrial Sites</b>	<p>Several sites have been amended or deleted to take account of assets and constraints on or adjacent to them. A number of sites have had notes added relating to flood risk. Two sites in Walsall Wood (IN6 (part) and IN8) have also been amended to take account of the proximity of a permitted mineral site which makes them unsuitable for redevelopment for housing.</p> <p>A very small part of proposed new allocation site IN122 (Former Moxley Tip) is proposed to be removed from allocation for industry to exclude the area of the site that is a Site of Interest for Nature Conservation</p>
<b>OS1</b>	<b>Open Space Network</b>	<p>It is proposed to add several sites to the open space network as follows:</p> <ul style="list-style-type: none"> <li>• The nature conservation areas excluded from sites HO303: Healthfield Lane, Darlaston, and IN122: Former Moxley Tip</li> <li>• Land at St Anne’s Road / Stringes Lane, Willenhall</li> <li>• The accesses to open spaces at OS5003: Alexandra Road and OS5012: Trees Road, Walsall</li> </ul>
<b>GB2</b>	<b>Development in the Green Belt</b>	<p>It is proposed to amend Policy GB2 so that proposals for the re-use of redundant buildings in the Green Belt will take into account whether they are “<i>of permanent and substantial construction.</i>” It is also proposed to add accessibility by a choice of means of transport as one of the criteria for assessing development that is appropriate in principle in the Green Belt.</p>
<b>EN1</b>	<b>Natural Environment Protection</b>	<p>It is proposed to amend Policy EN1 to ensure that account is taken of possible nature conservation impacts outside of the borough as well as within it, and also to provide for the possibility of compensatory as well as avoidance or mitigation measures. It is also proposed to expand the Policy Justification to explain the conclusions of the HRA of the SAD and AAP on Cannock Chase SAC and Cannock Extension Canal SAC. It is also proposed to remove the SSSI at Rushall Hall indicated on the SAD Policies Map as it was previously included erroneously. Natural England has confirmed that this SSSI does not exist.</p>
<b>EN3</b>	<b>Flood Risk</b>	<p>It is proposed to add an advice note to the policy that major developments in flood zones 2 and 3 should include an assessment of the vulnerability to flood risk relating to climate change, and finished floor levels should be set at an appropriate level taking into account climate change for minor developments.</p> <p>The policy justification includes additional comments relating to the latest available flood risk mapping. This mapping is also referred to in the list of assets and constraints for sites to be allocated under other policies, in particular sites for housing and industry.</p>
<b>EN4</b>	<b>Canals</b>	<p>It is proposed to amend the policy to clarify that the line of the Hatherton Canal restoration project is safeguarded - not allocated - and as such no support is implied through its inclusion in the SAD unless proposals can demonstrate that they</p>

		will not harm the integrity of the Cannock Extension Canal SAC (including measures to prevent boat movements). Modification also requires proposals relating to restoration project to be supported by evidence demonstrating that an adequate water supply can be provided, and that significant adverse impacts on the functions and ecology of wider canal network will be avoided. The modification also provides some support for alternatives to safeguard the indicative line of the projects if it becomes clear that the canal restoration project cannot be delivered during the plan period.
<b>EN7</b>	<b>Great Barr Hall and Estate</b>	It is proposed to re-write Policy EN7 on Great Barr Hall and Estate and the Policy Justification, to provide greater clarity to each aspect of the policy, and in light of the results of Historic England’s Listing Review which has downgraded Great Barr Hall and Chapel from Grade II* to Grade II. The aims and approach of the policy have not changed so the results of the policy appraisals are unaltered from the previous version of the SA.. The policy is not prescriptive as to the form any enabling development might take, but it is clear that the amount of development will be limited so that impacts on the environment are controlled and the benefits of any proposals should outweigh any negative implications.
<b>W2</b>	<b>Existing Waste Management Sites</b>	Updated information on the annual throughput of waste for two of the sites has been added. The assets and constraints for several sites have also been amended to include reference to the Darlaston Local Development Order and/or Enterprise Zone, and a note regarding flood risk for one site has been added.
<b>W3</b>	<b>Potential Waste Sites – Waste Treatment and Transfer</b>	It is proposed to amend the policy to add a requirement for applicants to provide evidence relating to fire risk and environmental constraints. The assets and constraints for several sites have been amended to include reference to the Darlaston Local Development Order and/or Enterprise Zone, as well as flood risk. It is proposed to delete Site WP13 (Former McKecknie’s, Middlemeore Lane / Dumblederry Lane, Aldridge) as the site owner is unwilling to support the inclusion of a waste designation and there is not a requirement for the Council to insist upon it
<b>W4</b>	<b>New Waste Management Development – Waste Disposal</b>	Site WP5 (North Walsall Cutting) is shown as an existing waste site rather than a proposed one, to reflect its current status.
<b>M1</b>	<b>Safeguarding of Mineral Resources</b>	It is proposed to amend the policy by: <ul style="list-style-type: none"> <li>• Deleting paragraph c) of the policy and moving it to the Policy Justification, expanding on the reasons for the statement that prior extraction of minerals will rarely be feasible on small previously-developed sites in the urban area;</li> <li>• Replacing the minerals safeguarding area (MSA) on the SAD and AAP Policies Maps and on Map 9.1 with the MSA on</li> </ul>

		<p>the BCCS Minerals Key Diagram, which includes ‘buffers’ around the mineral resource areas included in line with current good practice on minerals safeguarding, Map 9.1 is also to be re-numbered as Map 9.5.</p> <ul style="list-style-type: none"> <li>• Adding a new map (9.4) showing indicative MSAs for individual mineral types, including buffers, based on those shown in Appendix 7 of the BCCS; and</li> <li>• Adding a new indicative MSA for fireclay in Brownhills, based on evidence of where potentially winnable resources are likely to exist.</li> </ul>
<b>M2</b>	<b>Mineral Infrastructure Sites</b>	<p>It is proposed to add reference to impacts on other infrastructure in paragraph b) of the policy to ensure that proposals for new or upgraded mineral infrastructure, such as RMX plants, coating plants and aggregates recycling facilities, address any effects on other infrastructure (including transport infrastructure) as well as impacts on the environment and amenity. It is also proposed to amend the boundaries of Sites MI1: Former Bace Groundworks and MI7: Interserve Recycling Centre shown on the SAD Policies Map, which are adjacent to each other, to reflect changes to the site boundaries following the implementation of the Interserve development.</p>
<b>M7</b>	<b>Brick Clay Extraction – Stubbers Green</b>	<p>It is proposed to add a new map (9.1) to the Policy Justification showing the Area of Search, Brickworks, Permitted Minerals Sites and Potential Minerals Site in relation to designated nature conservation sites and other constraints to further brick clay extraction in the Stubbers Green area.</p>
<b>M8</b>	<b>Brick Clay Extraction – Other Areas</b>	<p>It is proposed to amend the policy for Highfields North (MP9) and the policy for brick clay extraction outside the permitted area as follows:</p> <ul style="list-style-type: none"> <li>• Amend restoration and after-use requirements for Highfields North in paragraph g), to require the entirety of any worked areas covered by the Jockey Fields SSSI designation to be restored as re-created habitats of similar/ enhanced value to those currently present, to remove references to end uses other than publicly accessible natural green space, and to require operator to consider transferring ownership to a conservation trust or similar body able to accept responsibility for long-term management of re-created habitats;</li> <li>• Amend policy for brick clay working outside the permitted area in paragraph j) to clarify arrangements for revocation of ‘dormant’ permission at Highfields North, and to remove reference to minimising loss of habitats within the Jockey Fields SSSI, retaining the reference to preventing loss only;</li> <li>• Add a new map (9.2) to the Policy Justification showing the Highfields North and Highfields South sites (MP6 and MP9) in relation to designated nature conservation sites and other constraints to implementation of the ‘dormant’ mineral permission or brick clay extraction on an alternative site nearby; and</li> <li>• Amend Policy Justification to explain the reasons for the above changes.</li> <li>•</li> </ul>

<b>M9</b>	<b>Coal and Fireclay Extraction - Brownhills</b>	<p>It is proposed to amend the policy as follows:</p> <ul style="list-style-type: none"> <li>• Amend paragraph a) of policy to explain that there are potentially winnable coal and fireclay resources in the Brownhills area, and that an indicative MSA for fireclay is shown on Map 9.4 indicating resources that could be worked during the plan period;</li> <li>• Add reference to proposed greenway in paragraph f) vii.</li> <li>• Insert new point xi) and amend start of following point – to clarify that applications must be supported by a detailed HRA of effects on Cannock Extension Canal SAC/ SSSI/ SLINC.</li> <li>• Amend paragraphs g) and h) of policy to clarify that the Yorks Bridge Area of Search identified in the BCCS is indicative, and is not designated as an Area of Search in the SAD because there is no evidence that a fireclay extraction scheme can be delivered in this location in the plan period, to clarify the relationship of Yorks Bridge to designated nature conservation sites, and to clarify that the Yorks Bridge policy also applies to proposals that may come forward outside the site identified on Map 9.3;</li> <li>• Amend paragraph h) of policy to clarify that applications must be supported by a detailed HRA of effects on Cannock Extension Canal SAC/ SSSI/ SLINC, and to include a reference to the Clayhanger SSSI which is also near to the Yorks Bridge site.</li> <li>• Add a new map (9.3) showing the location of the Birch Coppice and Brownhills Common sites (MP3 and MP5) and the Yorks Bridge site promoted by Potters Clay &amp; Coal Company and the Little Wyrley Estate in relation to designated nature conservation sites and other constraints to implementation of the ‘dormant’ mineral permission at Brownhills Common or fireclay extraction on an alternative site at Yorks Bridge; and</li> <li>• Amend Policy Justification to explain the reasons for the above changes.</li> </ul>
<b>M4 – M9</b>	<b>Permitted Minerals Sites and Brickworks</b>	<p>It is proposed to correct the boundaries of the Permitted Minerals Sites and Brickworks shown on the SAD Policies Map so that they more accurately reflect the ‘red line’ areas of the mineral permissions and/ or the curtilages of the brickworks.</p>
<b>T4</b>	<b>The Highway Network</b>	<p>It is proposed to amend the policy on Transport Assessments to more clearly reflect national policy in considering sustainable modes of transport, and a cost-effective approach to off-site mitigation measures.</p>
<b>T5</b>	<b>Highway Improvements</b>	<p>The policy has been updated to include reference to improvements to M6 Junction 10 and the policies map has been modified to show the location for the proposed upgrade area.</p>

**Table 9.2: Summary of Pre-Submission Main Modifications to Walsall Town Centre AAP**

Policies/ Sections Affected	Subject	Summary of Modifications
AAPB2	<b>Social Enterprise Zone</b>	In response to concerns from the land owner additional text has been proposed for Policy AAPB2: Social Enterprise Zone to allow for greater flexibility in regards to the use of listed buildings for housing within the social enterprise zone.
AAPB3	<b>Town Centre Employment Land</b>	Additional text has been proposed for Policy AAPB3: Town Centre Employment Land to clarify that sites which are allocated as ‘consider for release employment land’ also have allocations for centre uses, for example as an opportunity for office development.
AAPLE1	<b>New Leisure Developments</b>	An additional part has been proposed to Policy AAPLE1: New Leisure Developments to ensure better integration of leisure uses in the centre.
AAPLE4	<b>Walsall Canal</b>	Additional policy text to cross reference with the environmental infrastructure network in response to to comments from the Environmental Agency
AAPT3	<b>Public Transport</b>	As a result on on-going discussions with Transport for West Midlands (TfWM) (formally Centro) around bus capacity in the town centre a modification has been proposed to Policy AAPT3: Public Transport to include references to improvements in how the buses operate at St Paul’s bus station. The AAP Policies Map has also been amended to show St Paul’s as an Opportunity for public transport investment. In addition, text has been added to the policy to ensure that improvements are made to better link all of the public transport interchanges in the town centre.
AAPT4	<b>Road Improvements</b>	The Council has been progressing work on developing junction improvement schemes to increase the capacity of the town centre ring road. As a result of this work modifications are proposed to Policy AAPT4: Road Improvements and the policy justification to allow for the Council to seek S106 monies from developments on the town centre ring road or development that will result in significant traffic being directed to the ring road in order to undertake the identified improvements. A table has been included within the policy justification to provide a summary of the ring road improvements schemes. The AAP Policies Map has also been updated to remove any ring road improvements that are no longer proposed as a result of the more recent evidence.

<b>AAPT4</b>	<b>Road Improvements</b>	A further modification has been proposed to Policy AAPT4: Road Improvements in response to consultation representations from the West Midlands Integrated Transport Authority to allow for highway improvements needed for enhancement to public transport
<b>AAPT5</b>	<b>Car Parking</b>	Removal of short stay from the policy to ensure the policy covers all form of parking required in the town centre.
<b>AAPINV3</b>	<b>Walsall Gigaport</b>	Add boundary called Walsall Gigaport including all sites with the outline permission and also TC37, TC47 and TC55.
<b>AAPINV4</b>	<b>Walsall Waterfront</b>	In response to representations made by the Environment Agency additional text has been proposed to Policy AAPLE4: Walsall Canal and Policy AAPINV4: Walsall Waterfront to include references to design and landscaping along the canal with a cross reference to the environmental infrastructure policy.
<b>AAPINV4</b>	<b>Walsall Waterfront</b>	A modification has been proposed to Policy AAPINV4: Walsall Waterfront to remove reference to site as suitable for residential only when it is allocated on the Policies Map and elsewhere in the plan as an opportunity for mixed town centre uses.
<b>AAPINV7</b>	<b>Site Constraints – Minerals Safeguarding</b>	Amendments have been proposed to AAPINV7: Addressing Potential Site Constraints Part f) Minerals Safeguarding Area and the policy justification to make the AAP policy consistent with proposed modifications to SAD Policy M1. This has also involved a proposed modification to the AAP Policies Map to expand the Minerals Safeguarding Are

### **9.3 Appraisal of Modifications**

The proposed modifications were appraised using the same methodology as previous stages of the SA. See chapter 2 of the SA report.

### **9.4 Appraisal of SAD Main Modifications – Results**

The SA of the Main Modifications is summarised in Appendix Q of the SA Report, which summarises the outcome of the SA of each of the proposed Main Modifications.

Further details can be found in the SAD SA – Proposed Modifications Matrix (August 2016), which presents the overall results of the SA of each of the Publication Draft SAD Policies carried out in January 2016, the SA of the proposed Modifications carried out in August 2016, and the combined effects of the Policies with the Modifications.

None of the Modifications have been found to have significant harmful effects, which is not surprising as most of them are aimed at improving the clarity of the Publication Draft Policies, addressing anomalies/ inconsistencies, or ensuring that harmful effects of development are addressed.

In most cases, the Modifications have not changed the overall SA scoring, but in a few cases the SA scoring has been revised. Table 9.3 below summarises the policies where the SA scoring has been changed as a result of the effects of the Modifications.

**Table 9.2: Appraisal of SAD Modifications – Effects Identified and Proposed Mitigation**

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
<b>3. Homes for Our Communities</b>			
Policy HC1: Land Allocated for New Housing Development	<b>+</b>	The effect of the proposed Modifications on individual sites will be generally positive or neutral, but only a small number of sites involved, relative to the total number of housing sites referred to in the policy. The Modification also identifies existing constraints that would have to be taken into account anyway in accordance with existing national policy guidance and local plan policy. This means that the modifications will make no significant change to the effects of the policy as a whole.	No change to original evaluation prior to Modifications, as the Main Modifications to this policy only affect a relatively small number of sites. The overall effects of the Modifications are positive, therefore no further mitigation is required.
Policy HC4: Accommodation for Gypsies and Travellers and Travelling Showpeople	<b>+</b>	The effect of the proposed Modification on individual sites will be generally positive or neutral, but it affects only a small number of sites, relative to the total number of sites referred to in the policy. The Modification also identifies existing constraints that would have to be taken into account anyway in accordance with existing national policy guidance and local plan policy. This means that the Modification will make no significant change to the effects of the policy as a whole.	No change to original evaluation prior to Modifications, as the Main Modifications to this policy only affect a relatively small number of sites. The overall effects of the Modifications are positive, therefore no further mitigation is required.
<b>4. Providing for Industrial Jobs and Prosperity</b>			
Policy IND1: Existing High Quality Industry	<b>0</b>	The Modification only affects one site and identifies existing constraints that would have to be taken into account anyway in accordance with existing national policy guidance and local plan policy. It will therefore cause no significant change to the effects of	No change to original evaluation prior to Modifications, as the Main Modifications to this policy only affects one site. The overall effects of the Modifications are positive, therefore no further

		the policy as a whole.	mitigation is required
Policy IND2: Potential High Quality Industry	+	The effects of the proposed Main Modifications are positive or neutral measured against the majority of objectives. Only a small number of sites are affected relative to the total number of sites referred to by the policy. The Modifications also identify existing constraints that would have to be taken into account anyway in accordance with existing national policy guidance and local plan policy. This means the Modifications will cause no significant change to the effects of the policy as a whole.	No change to original evaluation prior to Modifications, as only a small number of sites are affected relative to the total number of sites referred to by the policy, so the modifications will cause no significant change to the effects of the policy as a whole. The overall effects of the Modifications are either positive or neutral, therefore no further mitigation is required.
Policy IND3: Retained Local Quality Industry	+	The effects of the Modification are neutral or unknown measured against the majority of objectives. However, the Modification only affects two sites: this small number relative to the total number of sites referred to by the policy means that the Modification will cause no significant change to the effects of the policy as a whole.	No change to original evaluation prior to the Modification, as only two sites are affected relative to the total number of sites referred to by the policy, so the Modification will cause no significant change to the effects of the policy as a whole. The overall effects of the Modification are likely to be positive and although there are uncertainties about some of the effects of changing the designation to Retained Local Quality Industry, this reflects the status quo (= 'do nothing'), and is considered preferable to the alternative option of keeping them as Local Quality Consider for Release. No further mitigation is therefore required.
Policy IND4: Local Industry Consider for Release	+	The Modifications will have negative or uncertain effects when measured against several objectives; however the negative	No change to original evaluation prior to Modifications, as only a small number of sites

		<p>effects identified are mostly likely to be short term and will only affect sites in a small area. The Modification also identifies existing constraints that would have to be taken into account anyway in accordance with existing national policy guidance and local plan policy, for example, the requirement for 'prior extraction' of minerals where feasible is derived from the Black Country Core Strategy (Policy MIN1). This means that the Modification will cause no significant change to the effects of the policy as a whole</p>	<p>are affected relative to the total number of sites referred to by the policy, so the modifications will cause no significant change to the effects of the policy as a whole. Although the overall effects of the Modifications are uncertain, no further mitigation is required thorough the SAD as any negative effects are expected to be addressed through the development management process.</p>
<p>Policy IND5: New Employment Opportunities</p>	<p>+</p>	<p>The Modification will have overall positive effects, and would only affect one site. The Modification also identifies existing constraints that would have to be taken into account anyway in accordance with existing national policy guidance and local plan policy. This means that the Modification will cause no significant change to the effects of the policy as a whole.</p>	<p>No change to original evaluation prior to Modifications, as only one of the sites included in the policy is affected, and the changes will not affect the delivery of industrial development, so the Modifications will cause no significant change to the effects of the policy as a whole. The overall effects of the Modifications are likely to be positive, and no further mitigation is required through the SAD as any negative effects from development are expected to be addressed through the development management process.</p>
<p><b>5. Strengthening Our Local Centres – no main modification proposed</b></p>			

SAD Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
<b>6. Open Space, Leisure and Community Facilities</b>			
<p><b>Policy OS1: Open Space, Sport and Recreation</b></p>	<p>+</p>	<p>This part of the appraisal relates to the effects of the policy as a whole in combination with relevant existing "saved" UDP and BCCS policies. The overall effects are likely to be positive as the policy will complement "saved" UDP Policies LC1 - LC6 and will help to deliver the requirements of BCCS Policy ENV3 to develop an environmental network in Walsall, and BCCS Policy ENV6 which requires the Council to identify the areas of Open Space that will be included in the network and safeguarded. The policy proposes the designation of Open Space sites &gt;0.4ha plus a selection of important sites that are less than 0.4ha (e.g. PCYP) which are considered key sites within the supply. In accordance with NPPF, all existing open space sites which are considered to be locally important are afforded the same protection. While the proposal to re-allocate some surplus/ lesser quality open space sites for other land uses could in some cases exacerbate existing quantitative deficiencies, this is only proposed where it is not feasible to make the improvements required to bring the site up to an appropriate standard. Furthermore, it is proposed to designate significantly more Open Space in the SAD than Policy LC1 of Walsall's UDP did previously. The effect of losing a limited number of low quality open space sites in areas of deficiency could be seen as a negative effect, however mitigation is required to compensate for its loss and the improvement of other existing open space sites could also potentially negate the effects of losing some quantity. Also, on balance, the policy is likely to have positive effects overall on SA3, SA5, SA6, SA8, SA9, SA13 and SA14, as it is proposed to allocate new areas of open space as well as to safeguard the majority of the pre-existing network. The policy also provides guidance on how the</p>	<p>No change to original evaluation prior to Modifications. The modification is to add to the open space network, and the changes will not adversely affect the open space network, Modifications will cause no significant change to the effects of the policy as a whole. The overall effects of the Modifications are likely to be positive, and no mitigation is required through the SAD.</p>

		<p>impact of proposals within or affecting open space provision will be determined, and signposts to the relevant national and local policies, including BCCS Policy ENV6 and "saved" UDP Policies LC1 - LC6. This will provide a basis from which to safeguard the functions associated with open space and ensure proposals likely to reduce the overall value of the network are either resisted, or if they cannot be, appropriate mitigation is provided to compensate any loss. The alterations made to the open space network (Ward's Pool SINC &amp; land at St Anne's Road and Stringes Lane) as a result of the pre-submission modifications are to improve the accuracy of the plan and do not alter the appraisal undertaken previously. The effects of the policy overall remain positive.</p>	
<b>7. Environmental Networks</b>			
Policy GB2: Control of Development in the Green Belt and Countryside	++	<p>The proposed modifications are to ensure consistency with National Policy and recognition that accessibility can be a consideration for development proposed in some areas of the Green Belt. Neither of these modifications is considered to result in effects that will influence the previous appraisal of the policy. There are likely to be strong positive effects from the application of the policy. This is as a result of the protecting the environment, encouraging developments to focused in what are generally more sustainable locations and the remediation of soils following the regeneration of brownfield land.</p>	<p>None identified. The overall effect of the Modifications is likely to be positive, and will not require mitigation through the SAD.</p>
Policy EN3: Flood Risk - Publication Draft Plan	++	<p>The proposed modification to the policy is intended to reflect the introduction of national flood risk and climate change guidance. The application of the policy is likely to have strong positive effects associated with facilitating development whilst providing appropriate levels of protection for people and businesses to mitigate the effects of flood risk and climate change.</p>	<p>None identified as this policy is "signposting" existing national policy and guidance relating to flood risk and explaining how it will apply to development in Walsall.</p>

<p>Policy EN4: Canals - Publication Draft Plan</p>	<p>+</p>	<p>The overall effects on the SA objectives are likely to be positive. Increased canal side activities that are sensitive to the canal side environment should help to create more desirable places for development, attracting further investment and recreational opportunities, including maintaining and improving existing walking and cycling routes in canal corridors (SA4, SA6, SA8, SA13). There are also likely to be positive effects on the townscape and heritage assets that form part of the canalside environment (SA5, SA9, SA12) as developments are expected to be of a high quality and to retain and conserve canalside buildings, features and structures of historic value, helping to address areas of dereliction, although the impact on landscape quality is less certain. The securing of contributions to maintain / improve the canalside infrastructure where justified is likely to help safeguard and improve the canal side environment (SA9) and mitigate any potential harmful effects from development in canal corridors. The application of the policy is also likely to promote accessibility of canals to sustainable modes of transport making them more accessible to local communities (SA4, SA13). The application of the policy is also likely to secure improvements to green infrastructure and enhancements to heritage assets within the canal corridors, as well as improving biodiversity, contributing positively towards the health and well-being of local communities and enhancing the townscape and landscape (SA2, SA5, SA7, SA8, SA9). The policy requires proposals to restore sections of the canal network to provide appropriate information as part of the planning application process demonstrating there will be no adverse effects to the water or wider environment (SA12, SA14) along with nature designations such as Cannock Extension Canal SAC. Effects to biodiversity are no longer considered uncertain (SA2, SA14) as the safeguarding of the indicative line does not imply support and the combined effect of the policy is to provide the requirements / guidance for proposals relating to the Lichfield and Hatherton Canal Restoration project. Increased development and activity in canal corridors may have some impact, however, such impacts should in most cases be capable of being mitigated where effective maintenance arrangements are put into place as requirements of any planning permissions granted.</p>	<p>None identified.</p>
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		Contributions from developers, where appropriate, will support the infrastructure from which the unique opportunity is provided.	
Policy EN7: Great Barr Hall and Estate and the former St. Margaret's Hospital	<b>+</b>	The policy has been reworded for clarity but the aims and outcomes of the policy have not changed to any major extent from the Publication Version of the SAD so the SA scores are unchanged.	No change to original evaluation prior to Modifications as the requirements of the re-worded policy remain the same. The main difference is that the policy and the reasons are clearer. The overall effects of the Modification are therefore similar to the policy in the Publication Draft SAD, and no further mitigation is required. Any negative effects from future development proposals at Great Barr Hall and Estate will be addressed through the development management process.
<b>8. Sustainable Waste Management</b>			
Policy W2: Existing Waste Management Sites	<b>0</b>	The combined effects of the existing policy with the Modification are very limited, as the Modification only relates to one Strategic Waste Site, and is to identify specific site constraints which need to be addressed if new proposals come forward on the site. This means that the Modification will make no significant change to the effects of the policy as a whole.	No change to original evaluation prior to Modifications, as the Main Modifications to this policy only affect one site and relate to site constraints rather than changes to the status of the site, and do not significantly restrict future expansion or redevelopment. The overall effects of the Modification are positive, therefore no further mitigation is required.
Policy W3: New Waste Management Development	<b>0</b>	The most significant change to the policy with the Modifications is the deletion of one of the Potential Waste Sites identified in the Publication Draft (Site WP13: Former McKechnie's Site). However, this does not affect the integrity of the policy or the delivery of the other sites identified. The other changes relate to the identification of specific site constraints on the other Potential Waste Sites which need to be addressed if new proposals come forward on the sites affected, and the expansion of the requirement for fire risk assessments to	No change to original evaluation prior to Modifications, as the Main Modifications to this policy only affect three Potential Waste Sites, and although one is to be deleted, the other changes relate to site constraints rather than changes to the status of the site, and do not significantly restrict future waste management development. The amendments to the policy on fire risk are also

		apply to all new waste treatment and transfer proposals, rather than just to operations carried out in the open. This means that the Modification will make no significant change to the effects of the policy as a whole.	unlikely to affect delivery of high quality waste management developments. The overall effects of the Modifications are either neutral or positive, therefore no further mitigation is required.
<b>9. Sustainable Use of Minerals</b>			
Policy M1: Safeguarding of Mineral Resources	□	The most significant changes to the policy with the Modifications are the replacement of the Publication Draft MSA with the MSA identified on the BCCS Minerals Key Diagram, which covers a larger area, and the addition of a statement that non-mineral development will not be permitted near to Areas of Search unless it has been demonstrated that it would not sterilise any of the mineral resources or prevent or compromise mineral working. The SA of these Modifications has identified potential for significant harmful effects on delivery of non-mineral development in Walsall in the long-term. However, this is a matter for the forthcoming BCCS review and not for the Walsall SAD and AAP, which have identified sufficient land to meet Walsall's requirements for new housing, employment and other development up to 2026 without compromising future mineral working on a commercial scale. The approach towards minerals safeguarding is consistent with the approach in BCCS Policy MIN1. The Modifications therefore do not affect the integrity of the policy or its overall effects.	No change to original evaluation prior to Modifications - no further mitigation required as the modified policy and MSA are in conformity with BCCS Policy MIN1 and the MSA shown on the BCCS Minerals Key Diagram, and will ensure that mineral resources are not needlessly sterilised by non-mineral development in Walsall over the remainder of the plan period.
Policy M2: Safeguarding of Minerals Infrastructure	+	The Modification has addressed an anomaly/ inconsistency in the Publication Draft policy, whereby impacts on other infrastructure were not previously taken into account. With the Modification, the policy is now considered to score very positively overall as well as positively against SA4, SA7, SA8, SA11, SA13 and SA14, as it now requires impacts on infrastructure (including social infrastructure, renewable and low carbon energy infrastructure, transport	No further mitigation required as the modified policy is consistent with the other minerals policies in the plan and will ensure that impacts on other key infrastructure are taken into account as well as impacts on health, the environment and amenity.

		infrastructure and water treatment infrastructure) to be effectively managed.	
Policy M7: Brick Clay Extraction – Stubbers Green	0	The modified policy identifies more clearly the constraints that will need to be overcome to demonstrate that further brick clay extraction at Stubbers Green will be acceptable, including the need for effective flood risk management taking into account vulnerability to climate change effects. The proposed Modification will reduce some of the uncertainties about the effects of further mineral development, ensuring that areas at risk from flooding are evaluated early on in the process. This will increase the likelihood that indirect harmful effects on designated nature conservation sites can be prevented, reduced and as fully as possible offset, and that any positive effects that can be achieved will be delivered. While the scoring of effects on SA3 and SA14 and overall scoring has been revised from uncertain to neutral as a result of this, it is inevitable that some uncertainties will remain. The precise effects of a mineral extraction proposal can only be determined at the planning application stage, when the details are known.	No further mitigation required as the modified policy will ensure that the constraints to further brick clay extraction at Stubbers Green are as clear as possible, so that the potential negative social, economic and environmental effects of new or revised proposals will be evaluated early on in the development process. It is therefore more likely that significant harmful effects will be prevented, reduced and as fully as possible offset through the design of the programme and through enhancement and mitigation.
Policy M8: Brick Clay Extraction	0	The modified policy identifies more clearly many of the constraints that will need to be overcome to demonstrate that proposals to implement the 'dormant' permission at Highfields North, or an alternative brick clay extraction scheme outside the permitted area, are acceptable. It will reduce the uncertainties about some of the effects of brick clay extraction in this area, allowing the scoring against some SA Objectives to be revised from uncertain to neutral. However, significant harmful effects on the SSSI/ SINC and on the local landscape will be unavoidable if the 'dormant' permission is implemented, and there is nothing the policy can do to prevent this. The Modifications have also not removed the uncertainties about the	No further mitigation required as the modified policy will ensure that the constraints to brick clay extraction at Highfields North and in the surrounding clay resource area are as clear as possible, so that the potential negative social, economic and environmental effects of implementing the 'dormant' permission or bringing forward a brick clay extraction on an alternative site will be evaluated early on in the development process. It is therefore more likely that significant harmful effects will be prevented, reduced and as

		impacts on the local highway network and related impacts on air quality, the loss of agricultural land and horse grazing land, restrictions on public access through loss or diversion of a PROW, and risks from flooding and related risks from climate change effects. It is inevitable that many uncertainties will remain, because the effects will depend on the scope of the development that comes forward. The effects of a particular mineral extraction proposal can only be determined with confidence at the planning application stage.	fully as possible offset through the design of the programme and through enhancement and mitigation.
Policy M9: Coal and Fireclay Extraction	+	The modified policy clarifies the requirements that will apply for coal and fireclay extraction in the area, including provision of a proposed greenway. It also clarifies the reasons why Yorks Bridge has not been designated as an area of search for fireclay extraction, expands on the nature conservation designations that apply in the area, and the requirements of the HRA.	No further mitigation required as the modifications themselves add requirements for mitigation.
<b>10. Transport and Infrastructure</b>			
Policy T4: The Highway Network	0	The Modification will have overall neutral effects, as it aims to bring the policy into conformity with paragraph 32 of the NPPF, which would apply to major traffic-generating developments in any case, without the Modification. This means that the Modification will cause no significant change to the effects of the policy as a whole	No change to original evaluation prior to Modification, as it would not affect the overall application of the policy in combination with the NPPF. The overall effects of the policy with the Modification are neutral, therefore no mitigation is required
Policy T5: Highway Improvements	0	The Modification will have overall neutral effects, as it aims to bring the policy into conformity with paragraph 32 of the NPPF, which would apply to major traffic-generating developments anyway. This means that the Modification will cause no significant change to the effects of the policy as a whole.	No change to original evaluation prior to Modification, as it would not affect the overall application of the policy in combination with BCCS Policy TRAN1. The overall effects of the policy with the Modification are neutral, therefore no mitigation is required.

Source: SA Report Appendix J and High Level Appraisal of SAD Policies - Completed Matrix (January 2016)

**Table 9.3: Changes to SA of SAD Policies with Modifications**

SAD Policy	Original SA Scoring (January 2016)	Revised SA Scoring with Modifications (August 2016)	Reasons for SA Revision
<b>EN4: Canals</b>	++	+	Following the representations received, and the inability to assess impacts associated with the Lichfield and Hatherton Restoration project, as there is no detailed proposal as yet (see the council’s HRA for more information). As a result of deferring detailed assessments to the project stage it is not considered appropriate to conclude that there will be significant positive effects as a result of implementing the policy. The revised scoring is on the basis that while the council is confident that through the application of SAD policy EN4 the Cannock Extension Canal SAC and other nature designation sites will be afforded appropriate consideration through the development management process. It would have been preferable to have been in a position to assess the impacts, were there to be a detailed project, at the time of preparing the SAD, and for the SAD to provide a framework to ensure that should mitigation measures be required they are delivered.
<b>M2: Mineral Infrastructure</b>	+	++	The Modification has addressed an anomaly/ inconsistency in the Publication Draft policy, whereby impacts on infrastructure were not previously taken into account. With the Modification, the policy is now considered to score very positively overall as well as positively against SA4, SA7, SA8, SA11, SA13 and SA14, as it now requires impacts on infrastructure (including social infrastructure, renewable and low carbon energy infrastructure, transport infrastructure and water treatment infrastructure) to be effectively managed.
<b>M7: Brick Clay Extraction – Stubbers Green</b>	?	0	The modified policy identifies more clearly the constraints that will need to be overcome to demonstrate that further brick clay extraction at Stubbers Green will be acceptable, including the need for effective flood risk management taking into account vulnerability to climate change effects. The proposed Modification will reduce some of

			<p>the uncertainties about the effects of further mineral development, ensuring that areas at risk from flooding are evaluated early on in the process. This will increase the likelihood that indirect harmful effects on designated nature conservation sites can be prevented, reduced and as fully as possible offset, and that any positive effects that can be achieved will be delivered. While the scoring of effects on SA3 and SA14 and overall scoring has been revised from uncertain to neutral as a result of this, it is inevitable that some uncertainties will remain. The precise effects of a mineral extraction proposal can only be determined at the planning application stage, when the details are known.</p>
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Source: SAD SA – Proposed Modifications Matrix (August 2016)

## **Overview of Appraisal Results**

The SA of the Main Modifications is summarised in Appendix Q of the SA Report, which summarises the outcome of the SA of each of the proposed Main Modifications.

Further details can be found in the SAD SA – Proposed Modifications Matrix (August 2016), which presents the overall results of the SA of each of the Publication Draft SAD Policies carried out in January 2016, the SA of the proposed Modifications carried out in August 2016, and the combined effects of the Policies with the Modifications.

None of the Modifications have been found to have significant harmful effects. Most of them are aimed at ensuring potential harm to future occupiers of sites, in particular from flooding or mineral working, is addressed, either by deleting the proposed allocation of the site for the proposed use or by highlighting the need to take constraints such as flood risk into account in any development. In few cases, the appraisal has resulted in the impact on particular objectives changing from being uncertain to being neutral or positive.

Table xx provides a overview of these changes and a summary of the effects. All of the other main modifications were reviewed against the previous appraisals to ensure that they do not raise anything that would not have been appraised as part of the previous SA stages. Details of the main modifications that have not been appraised and further explanation as to why they have not been included are given in Appendix Q to the SA of the Pre-Submission Modifications.

## **Short, Medium and Long-Term Effects**

Most of the modifications that needed to be appraised were considered to have effects that last to until the end of the plan period and beyond.

Exceptions to this are the addition of a reference to mineral safeguarding for a small number of “consider for release” employment sites in Willenhall and Darlaston, and the deletion as a potential housing site of land in Hall Lane, Walsall Wood because of the proximity of a permitted mineral site. In both cases, the mineral working would have significant adverse local effects whilst it was taking place but most of these effects (except perhaps on biodiversity) would end once the working ceased.

## **Permanent and Temporary Effects**

As noted above, the effects of most of the modifications would be permanent, at least until such time as the plan is reviewed. This applies to changes to the use for which a site is allocated, the boundaries of the site, and the assets and constraints that affect the site. Some assets and constraints could change in the future. For example, additional historic buildings could be listed or the boundaries of conservation areas could change. The extent

of areas at risk of flooding could alter as a result of developments elsewhere that affect water run-off, or climate change.

### **Positive Effects**

Nearly all the proposed modifications would have a positive effect. These include safeguarding new housing development from the risk of flooding and disturbance from mineral working, protecting additional areas of open space and sites of nature conservation value, and mitigating the impact of waste and mineral developments.

### **Negative Effects**

Much new development would have some negative effects, although this is normally balanced by the positive effects. The only modification that has been identified as having an overall negative effect is that relating to the boundaries of certain permitted mineral sites (MMSAD54). The main changes as a result of this modification are to the boundaries of two mineral sites, MP7 and MP9 (Sandown Quarry and Highfields North), where the revised boundaries encroach on a SSSI and existing industry that had been considered for release to housing. However, these boundaries have been revised to reflect existing planning permissions, so the SAD is unable to provide mitigation except to ensure that any new development that might be proposed on nearby sites takes these permissions into account. This modification (to policies M7 and M8) has therefore been scored above as neutral or positive.

### **Secondary, Cumulative and Synergistic Effects**

Nearly all the modifications will only have localised effects, as a result of changes to individual sites. The cumulative effect at a borough-wide level, particularly from the main policies in the SAD such as those relating to the amount of new housing and employment land to be provided, and open space to be protected, will be negligible.

### **Inter-Relationships between Effects**

Many of the policies are inter-related. For example, the location of mineral operations affects the suitability of nearby land for housing development, and the provision of an adequate supply of land for industry in suitable locations is important to ensure there are jobs available to enable residents to buy or rent new housing. Many of the proposed modifications seek to address the relationships between adjoining land uses. For example, the boundaries of some housing sites have been amended to avoid areas of nature conservation interest or flood risk.

## **Potential ‘Significant Effects’ – Proposals for Mitigation**

Many of the modifications have themselves been proposed to provide mitigation against potential significant and other effects. As such, the effects of the modifications are positive and do not require further mitigation. The only modification that has been identified as having a negative effect is an amendment to the boundaries of certain mineral sites. As noted above, these sites already have planning permission and the purpose of the modification is to ensure that any nearby developments for other purposes take the existence of the permission into account.

### **9.5 Likely Effects of SAD Modifications on Equality and Diversity - Conclusions**

The modification to policy HC4 to state that the proposed gypsy and traveller sites would be for permanent occupation would clarify the status of the proposed sites for the benefit of these protected groups.

Willenhall and Darlaston are relatively deprived (see figure 25 in the review of baseline conditions). The review indicates that their proportion of residents of an ethnic minority is similar to the borough average at the area partnership level, however this may hide local concentrations of ethnic minority residents in close proximity to the “consider for release” employment sites where the need for mineral safeguarding has been identified. As such, the modification relating to mineral safeguarding in these areas may have a disproportionate impact on members of ethnic minorities, as well as on residents with low incomes and other types of deprivation.

### **9.6 Likely Effects of SAD Modifications on Health and Wellbeing - Conclusions**

The only modification that is shown to have an impact on health and wellbeing is that to policy M8. The impact of this policy on the health and wellbeing objective was previously uncertain, but the modification means that the impact can now be shown to be neutral. The modification to this policy has no effect on the overall score.

## 9.7 Appraisal of AAP Modifications – Results

### Overview of Appraisal Results

SA of the Main Modifications is summarised in Appendix Q of the SA Report, which summarises the outcome of the SA of each of the proposed Main Modifications.

Further details can be found in the AAP SA – Proposed Modifications Matrix (August 2016), which presents the overall results of the SA of each of the Publication Draft AAP Policies carried out in January 2016, the SA of the proposed Modifications carried out in August 2016, and the combined effects of the Policies with the Modifications.

None of the Modifications have been found to have significant harmful effects, which is not surprising as most of them are aimed at improving the clarity of the Publication Draft Policies, addressing anomalies/ inconsistencies, or strengthening the policies to ensure they strengthen the centre. Table 9.4 provides an overview of these changes and a summary of the effects. All of the other main modifications were reviewed against the previous appraisals to ensure that they do not raise anything that would not have been appraised as part of the previous SA stages. Details of the main modifications that have not been appraised and further explanation as to why they haven't are included as part of Appendix Q SA of the Pre-Submission Modifications.

A comparison between the previous overall score of the policies and the scores following modifications has shown that none of the modifications change the results and therefore the overall impact on the policies.

**Table 9.4: Appraisal of AAP Modifications – Effects Identified and Proposed Mitigation**

AAP Policy	Overall SA Score	Summary of Effects	Proposed Mitigation
<b>A Place for Business</b>			
Policy AAPPB2: Social Enterprise Zone		The current social enterprise will hopefully grow offering more opportunities for skills to help young people access work. Other social enterprises	As the policy states “Residential uses may be supported where buildings within the Social Enterprise Zone are historically listed if it can be demonstrated

	+	focussing on different needs will also be encouraged into area. The additional wording should mean that there is more flexibility for the historic buildings in the zone which has benefits to the cultural heritage and historic character of the centre.	this is the best approach to maintaining the character of the buildings and that any proposal will not jeopardise the delivery of a Social Enterprise Zone” there is no foreseen negative impact of the modification to be mitigated against. It is possible that there will be some conflict between residential uses and social enterprise uses in terms of noise but as the policy states the residential uses should not compromise the delivery of a social enterprise zone we would expect ant residential proposals to be designed in a way to mitigate any potential conflict.
<b>A Place for Leisure</b>			
Policy AAPLE1: New Leisure Development New Part g)	+	The addition to the policy will have an overall effect of ensuring leisure uses are well integrated with the rest of the centre. This will have the knock on impact of ensuring footfall from the leisure use is directed to other town centre uses such as retail. It will also ensure that leisure uses are accessible by public transport reducing the need to travel by car and making development in the centre more sustainable. The better integration of developments should also have a positive impact on the townscape of the centre.	Where a proposal fails to meet the policy test it could mean that schemes are not supported. However many of the policy test can be overcome through the design of a proposal. Proposals will only be refused where they will have a negative impact on the vitality and viability of the centre. . Proposals will only be refused where they will have a negative impact on the vitality and viability of the centre and a balanced judgement will be made between losing out of a leisure investment and the potential negative impact on the town centre of a leisure use at that proposed location.
<b>Transport, Movement and Accessibility</b>			
Policy AAPT3: Public Transport Part b)	+	The overall effect is likely to be positive as improved customer experience and enhanced bus operations may mean more	It is possible that improved bus operations will result in more buses within the centre and a higher concentration of air

		people use the bus service and that they have a positive feeling about using the bus to access the town centre	emissions. This is however counterbalanced by the reduction in car emissions from people choosing to use the bus over other means of transport. The adoption of the Air Quality SPD should help to tackle the issue of public transport generated air pollution and the AAP includes a policy that looks to mitigate the impact on any individual proposal.
Policy AAPT3: Public Transport New Part e)	+	The overall effect is likely the new part of the policy looks to ensure that public transport is well connected, accessible and easy to use promoting the further use of sustainable travel and also creating a town centre that is easy to navigate and accessible to all.	It is possible that this will result in further buses which result in higher emissions in some areas but this is considered to be outweighed by the reduction in car usage in and around the centre. There is also an emerging Air Quality SPD that will look to mitigate the impacts of air pollution of the town centre.
Policy AAPINV7: Addressing Potential Site Constraints	+	The most significant changes to the policy with the Modifications are the replacement of the Publication Draft MSA with the MSA identified on the BCCS Minerals Key Diagram, which covers a larger area, and the addition of a statement that non-mineral development will not be permitted near to Areas of Search unless it has been demonstrated that it would not sterilise any of the mineral resources or prevent or compromise mineral working. The SA of these Modifications has identified potential for significant harmful effects on delivery of non-mineral development in Walsall in the long-term. However, this is a matter for the forthcoming BCCS review and not for the Walsall SAD and AAP, which	The Modifications therefore do not affect the integrity of the policy or its overall effects so no mitigation is necessary

		<p>have identified sufficient land to meet Walsall's requirements for new housing, employment and other development up to 2026 without compromising future mineral working on a commercial scale. The approach towards minerals safeguarding is consistent with the approach in BCCS Policy MIN1. The Modifications therefore do not affect the integrity of the policy or its overall effects.</p>	
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### Short, Medium and Long-Term Effects

All of the modifications that needed to be appraised were considered to have effects that last to until the end of the plan period and beyond.

The proposed modification to the Social Enterprise Zone policy wording will have both short and long term impacts. The flexibility in allowing residential uses in listed buildings where it can be demonstrated this is the best approach to maintaining the character of the buildings and that any proposal will not jeopardise the delivery of the Zone will have long term impacts on the character of the centre by ensuring historic buildings are preserved and get in use. Whilst this may also have some long term impacts on the amount of social enterprise uses within the area the policy is written in a way to ensure that these impacts do not adversely impact the delivery of the policy aim overall.

The construction of new leisure developments may be relatively short-term, depending on the size and scale of the development and the constraints, but once construction has been completed, the ongoing effects of the development, for example, from the generation of trips into the Town Centre, changes to pedestrian movements, contribution towards economic growth and job creation, or demand for infrastructure, are likely to be long-term.

The additional text that looks to enhance the operation of buses at St Paul's will have short, medium and long term effects including the long term impact of changing people behaviour by encouraging greater use of public transport. It may have short to medium effects in air pollution if more buses operate from the station, but this should be counterbalanced in the long term by fewer emissions overall as people use cars less to access the town centre.

Ensuring strong connections between all modes of public transport in the town centre short have both short term effects in improving the experience of travelling in and around the

centre but also long term effects in changing peoples travelling habits and increasing the number of people who access the town by public transport.

### **Permanent and Temporary Effects**

All of the modifications are considered to have a permanent effect on the town centres.

#### **Positive Effects**

The increased flexibility to the Social Enterprise Zone policy actually results in the policy have more positive impacts as it means it is more likely that the historic that the historic buildings will be persevered and maintained through an active appropriate use. This has positive effects the historic character of the centre.

The addition to the leisure policy will have an overall effect of ensuring leisure uses are well integrated with the rest of the centre. This will have the knock on impact of ensuring footfall from the leisure use is directed to other town centre uses such as retail. It will also ensure that leisure uses are accessible by public transport reducing the need to travel by car and making development in the centre more sustainable. The better integration of developments should also have a positive impact on the townscape of the centre supporting other developments and investments in the centre along with ensuring facilities are accessible by public transport.

Both the modifications that look to ensure the effective operation of public transport in the centre will have positive impacts by encouraging more sustainable modes of transport, ensuring the centre is accessible to all and by reducing emissions from cars.

#### **Negative Effects**

It is possible that there will be some conflict between residential uses and social enterprise uses in terms of noise but as the policy states the residential uses should not compromise the delivery of a social enterprise zone we would expect ant residential proposals to be designed in a way to mitigate any potential conflict

Where a proposal for leisure uses fails to meet the policy test it could mean that schemes are not supported. However many of the policy test can be overcome through the design of a proposal. Proposals will only be refused where they will have a negative impact on the vitality and viability of the centre and a balanced judgement will be made between losing

out of a leisure investment and the potential negative impact on the town centre of a leisure use at that proposed location.

### **Secondary, Cumulative and Synergistic Effects**

Social enterprises working in the centre to address the needs of the surrounding community could help address wider social and economic issues in the borough. The preservation of historic buildings can help improve the attractiveness of the centre to both visitors and investors.

By ensuring leisure uses are either within the heart of the centre or well connected to the centre proposals are more likely to result in linked trips which can support other uses in the centre such as retail. Also by having accessible leisure uses people are more likely to use public transport to access such facilities reducing car trips, air pollution and congestion.

It is possible that improved connectivity between public transport in the centre and the enhancement of bus operation at St Paul's will result in more bus services being required and therefore increased air pollution. This is however outweighed by the positives of public transport such as removing cars and therefore reducing air pollution. Also the more public transport provides greater opportunities for communities to access services and jobs.

### **Inter-Relationships between Effects**

A diverse offer within the heart of the centre is needed to allow Walsall to compete with surrounding centres by providing a leisure experience. The better located and well integrated leisure investment the centre manages to secure the more likely the centre is to attract visitors and investment.

Improved public transport and increased usage should help to reduce emissions from cars in and around the centre which will have overall positive impacts on the environment in the centre. Also the signage used to help people access public transport can help to make the centre more legible overall better connecting people with the urban fabric of the centre.

### **Potential 'Significant Effects' – Proposals for Mitigation**

No significant effects have been identified as a result of any of the modifications that have been proposed.

## **9.8 Likely Effects of AAP Modifications on Equality and Diversity - Conclusions**

Social enterprises are often focussed around the needs of the local community so a policy that promotes further development of such organisations should have an overall positive impact on equalities and diversity. As the additional text states that any residential uses would need to show that they will not jeopardise the delivery of the social enterprise zone the change should not alter the effects the policy has on equality and diversity.

By locating leisure uses at the heart of the centre in means that people can access it through public transport and through linked trips to other facilities. By then requiring any developments that are on the edge of centre are well integrated it reduces the risk of such facilities being car depended or inaccessible to any of Walsall community. The modification is therefore seen as having a positive impact on equality and diversity by ensuring facilities are accessible to all.

Improved public transport is also seen to having a positive impact on equality and diversity as often public transport is used by those communities that can be disadvantaged by not owning a car or mobility issues. This ensures the town centre is as accessible as possible, providing opportunities for communities to access facilities and jobs.

## **9.9 Likely Effects of AAP Modifications on Health and Wellbeing – Conclusions**

Social enterprises are often focussed around the needs of the local community so a policy that promotes further development of such organisations should have an overall positive impact on health and well-being. As the additional text states that any residential uses would need to show that they will not jeopardise the delivery of the social enterprise zone the change should not alter the effects the policy has on health and well-being.

Both the changes to the leisure policy and transport policies are considered to have a positive impact on health and wellbeing for similar reasons as to those above. A better linked, accessible and integrated centre allows all the community to access facilities, encourages walking between facilities and provides for a better environmental quality in the centre.