



Walsall Council

**Integrated Sustainability Appraisal (SA) of the
Walsall Site Allocations Development Plan Document (SAD)
Walsall Town Centre Area Action Plan (AAP)**

Incorporating

**Strategic Environmental Assessment (SEA)
Equality Impact Assessment (EqIA)
Health Impact Assessment (HIA)**

SA Stage 2:

Options Appraisal Report

April 2013



Walsall Planning 2026: Have Your Say

Consultation 22/04/2013 to 03/06/2013

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1. Introduction

1.1 Background

This report summarises the results of the first stage of the sustainability appraisal (SA) of the Walsall Site Allocations Document (SAD), and the Walsall Town Centre Area Action Plan (AAP). Both plans are development plan documents, and will form part of the Local Plan (statutory development plan) for Walsall when they are adopted. The plans are being developed to provide locally specific guidance setting out how the Black Country Core Strategy (BCCS) 2011 will be delivered in Walsall.

The BCCS provides a strategic planning framework for the Black Country, identifies broad locations for development in Walsall, and identifies Walsall Town Centre as the strategic centre for the borough, but does not allocate specific sites for development. The Council is therefore preparing the SAD to allocate development sites and designate sites to be safeguarded, and the AAP as a strategy for the regeneration of the strategic centre, to ensure that the spatial strategy in the BCCS will be delivered in Walsall.

As the plans are being developed in parallel, the SAs are also being carried out at the same time, allowing inter-related and cross-boundary effects on sustainability to be identified and evaluated. Although the appraisals are being carried out by the Council, at each stage the results will be reviewed by Ursus Consulting Ltd which has been appointed as the Council's SA advisor.

1.2 Key Stages of Sustainability Appraisal - Where Are We?

Table 1 below summarises the key stages of plan preparation and the corresponding stages of SA. We have now completed the first two stages: Scoping and Preliminary Options Appraisal as highlighted in the table.

Table 1: Sustainability Appraisal of SAD and AAP – Key Stages – Where We Are Now

SAD and AAP Key Stages	SA Key Stages	SEA Key Stages	EqIA Key Stages	HIA Key Stages
1. Pre-Production	1: Scoping Setting objectives and developing the baseline, consulting on the scope of the sustainability appraisal	Stages A1 – A5	Incorporation of key equality issues into SA framework	Incorporation of key health issues into SA framework
2. Issues & Options	2: Options Appraisal Considering options and alternatives	Stages B1 – B2	SA of SAD and AAP Options – identify potential equality impacts	SA of SAD and AAP Options – identify potential health impacts
3. Draft Plans (Preferred Options)	3: Appraisal of Preferred Options Refining options and assessing effects of preferred options	Stages B3 – B6	SA of SAD and AAP Preferred Options – identify potential equality impacts, complete EqIA Questionnaire	SA of SAD and AAP Preferred Options – identify potential health impacts
4. Publication	4: Final Appraisal Preparing and consulting on draft DPD and SA report	Stages C and D1	SA of Publication SAD and AAP – identify and address potential equality impacts, complete EqIA Questionnaire	SA of Publication SAD and AAP – identify and address potential health impacts
5. Submission	5: Appraisal of Significant Changes (if required)	Stage D2	Appraising impact of changes on equality	Appraising impact of changes on health
6. Independent Examination	6. Independent Examination	Stages B2 – D2 update as required	Revisit appraisal of effects on equality as required	Revisit appraisal of effects on health as required
7. Inspector's Report	7. Review Inspector's Recommendations	N/A	N/A	N/A
8. Adoption	8: Adoption SA Adoption Statement	Stage D3	Review overall impact of adopted plan on equality for SA Adoption Statement, complete final EqIA Questionnaire	Review overall impact of adopted plan on health for SA Adoption Statement
9. Monitoring & Implementation	9: Monitoring Significant Effects	Stages E1 and E2	Monitoring of equality impacts	Monitoring of health impacts

Source: Table 3.2, Walsall SAD and AAP SA Scoping Report (February 2013)

1.2.1 SA Stage 1: Scoping

The Council has published a revised SA Scoping Report (April 2013). This has been extensively updated to reflect the comments received during the scoping consultation between September and November 2011, and feedback received from the Council's SA advisor in June 2012.¹ The revisions also follow a comprehensive review of baseline evidence carried out by the Council during the latter half of 2011 and the first part of 2012, to inform the SA and plan preparation.

Section 1 of the Scoping Report explains that the SA will also incorporate three other types of assessment that must be carried out on the SAD and AAP – strategic environmental assessment (SEA), equality impact assessment (EqIA) and health impact assessment (HIA). The Scoping Report also includes an analysis of the policy context for the plans and the requirements of existing plans, policies and programmes (Sections 2 and 4), existing “baseline” sustainability conditions (Section 5), and the key issues, problems and opportunities the plans will have to address (Section 6). Further details of the plans, policies, programmes and evidence reviewed are set out in Appendices D and E.

Section 3 of the SA Scoping Report explains how the SAs will be carried out, and the level of detail they will go into at each key stage in plan preparation. The SA Framework to be used to appraise the plans (Appendix G of the Scoping Report) comprises 14 SA Objectives with linked criteria and indicators, and has been developed from the framework used to appraise the BCCS.

1.2.1 SA Stage 2: Options Appraisal

This stage of SA is split into two phases:

- Objectives Testing

¹ See: Walsall Council - Review of SA of Site Allocations DPD and Town Centre Area Action Plan, Initial Report (5 June 2012), Ursus Consulting Ltd.

- Options Appraisal

Issues and Options documents for both plans were produced in April 2013 for public consultation. The consultation documents identify the objectives, key issues and “reasonable” alternative options for each plan. These documents were prepared following an initial consultation on the Draft SA Scoping Report and “Call for Sites” in 2011/ 2012. They have also been informed by a significant body of evidence about existing national and local policy requirements, key trends in land use and development, and sites in Walsall that could be allocated or designated for particular uses. This evidence has been gathered from a variety of published and unpublished sources, including the evidence on plans, policies and programmes and sustainability conditions reviewed in the SA Scoping Report.

The objectives for each plan have been “tested” against the SA objectives developed during the scoping stage, which are reproduced at Appendix A. The “reasonable” options identified for each plan have also been subjected to a “high level” assessment using the SA Framework developed at the scoping stage (see Appendix G of the SA Scoping Report), and the results are presented in this report.

1.3 Public Consultation on the SA

The legislation covering strategic environmental assessments (SEA) requires the Council to consult key environmental bodies and the public on assessment reports. This Options Appraisal report has therefore been published alongside the SAD and AAP Issues and Options documents, and the public has been invited to comment on the Options Appraisals we have carried out. We have asked the following questions in the main Issues & Options documents.

Site Allocations Document (SAD)

Chapter 2: About Walsall and Policy Context

AW:Q2 Do you have any comments on the preliminary SA of the options for the SAD? (Please refer to the separate Options Appraisal Report for details of the SA carried out at this stage and the results for each “reasonable” Option identified. If you are commenting on the appraisal of a particular Option, rather than the appraisal process generally, please give the Option reference number).

Town Centre Area Action Plan (AAP)

Chapter 1: Introduction

INT:Q1 Do you have any comments on the preliminary SA of the options for the AAP? Please refer to the separate Options Appraisal Report for details of the SA carried out at this stage and the results for each “reasonable” Option identified. If you are commenting on the appraisal of a particular Option, rather than the appraisal process generally, please give the Option reference number.

There is space within the first section of the “Have Your Say” Response Forms for each plan for people to make comments on the SA.

Important Note:

This Options Appraisal Report (April 2013) has been published by the Council for public consultation in advance of the review of the SA by Ursus Consulting Ltd, the Council’s SA advisor. The Council is expecting to receive feedback on the SA during the Issues & Options consultation period, and will publish the consultant’s report in due course. The appraisal will be reviewed and revised if necessary to take account of the consultant’s advice and any relevant comments received during the consultation period.

2. Testing of SAD & AAP Objectives

2.1 The Objectives for the SAD and AAP

The Council has identified **ten objectives** for each plan. These are reproduced in the left-hand column of the SAD Objectives Testing Matrices in Appendices B and C. The SAD objectives been developed out of the BCCS spatial objectives but are more locally specific, reflecting the Council's aspirations for Walsall Borough. The AAP objectives have been developed out of the objectives for the strategic centre identified in the BCCS, the objectives of the Council's Corporate Plan, and the Council's vision and aspirations for the Town Centre.

2.2 Results of Objectives Testing – SAD

Appendix B shows that the objectives for the SAD are generally compatible with the SA Objectives. The SAD Objectives most closely aligned with the SA Objectives are:

SAD Objective 3 (Delivery of Sustainable Communities) – this objective is particularly compatible with SA Objectives 4, 5, 6, 7, 12 and 13, as it would involve improvement of existing buildings and development on vacant, derelict, and under-used land within the urban areas, in areas likely to be accessible to existing public transport, walking and cycling networks.

SAD Objective 4 (Delivery of Development in Local Centres) – this objective is particularly compatible with SA Objectives 3, 6, 7, 8 and 13 as it would create a pattern of movement likely to reduce dependence on the car, take advantage of existing public transport, walking and cycling networks, to encourage active travel modes likely to be more beneficial to health, and minimise transport emissions.

SAD Objective 5 (Delivery of Environmental Infrastructure Network) – this objective is particularly compatible with SA Objectives 2, 3, 4, 5, 8 and 9, as such a network would include sites of importance for biodiversity, geodiversity, cultural

heritage, landscape and townscape, including multi-functional open spaces that could manage the impacts of climate change.

The main areas of incompatibility are as follows:

SAD Objective 2 (Retain Local Quality Employment Land) – retaining existing employment areas, particularly low quality ones, could be a disincentive for businesses to redevelop or relocate into more modern buildings which are more likely to be energy and water efficient, and could also prevent redevelopment of adjoining land for other uses such as housing, and may therefore be incompatible with SA Objectives 3, 4, 11 and 14.

SAD Objective 6 (Protection and Enhancement of Environmental Assets) – there is potential tension between this objective and SA Objective 10, which allows for some mineral extraction to support sustainable economic growth. Some harm to nature conservation sites in the mineral resource areas identified is unavoidable, though this could be mitigated through provision of replacement habitats.

SAD Objective 10 (Safeguarding and Exploitation of Mineral Resources) – this objective is incompatible with SA Objectives 1, 2, 4, 5, 9, 13 and 14, as the resources most likely to be economic to work are underlying greenfield sites in the Green Belt, some of which are of importance for biodiversity, have underlying water resources or may have other implications for hydrology, or could contain archaeological remains. The relationship with SA Objective 12 is also likely to be negative in the short-term, although in the long-term sites will be beneficially restored, and any geotechnical problems arising from mineral extraction will be expected to be addressed.

There is uncertainty about the relationship between **SAD Objective 3** and SA Objectives 1 and 14, as the objective could allow development in areas where limit values for nitrogen dioxide (NO₂) are being breached and areas at risk of flooding.

2.3 Results of Objectives Testing – AAP

Appendix B shows that most of the AAP Objectives are compatible with the SA Objectives. There is a particularly high degree of compatibility between AAP Objectives 1 – 6 and SA Objectives 6 and 13. The Town Centre is the most accessible place in the borough, so objectives that seek to steer investment and development of “town centre” uses in the Town Centre will complement the SA objectives towards sustainable economic development and transport. As development in the Town Centre will be accessible to most people in the borough, the AAP Objectives are also compatible with SA Objectives 4 and 7 which are concerned with everyone having access to the facilities they need.

AAP Objectives 8, 9 and 10 are also particularly compatible with SA Objectives 2, 3, 5, 9, and are also linked to SAD Objective 5, as they are concerned with delivering environmental infrastructure in the Town Centre, which would contribute towards wider borough network, and would include sites of importance for biodiversity, geodiversity, cultural heritage, landscape and townscape, including multi-functional open spaces that could manage the impacts of climate change.

The only areas of incompatibility between the AAP Objectives and the SA Objectives are between AAP Objective 7 and SA Objectives 1 and 3, if the objective has the effect of increasing the number of trips by road into and within the Town Centre. The exceedance of statutory limit values for nitrogen dioxide (NO₂) identified on the fringes of the Town Centre through air quality monitoring are largely caused by road transport, including buses which are the main form of public transport used in the borough. Road transport is also a significant cause of the carbon dioxide (CO₂) emissions that contribute towards climate change. Such effects could be mitigated if the new infrastructure provided - including buses - is low-emission.

As the AAP Objectives are not site-specific, there is considerable uncertainty about the relationship to the SA Objectives in some cases, as the implications are not fully understood. Examples of this include AAP Objectives 1 – 5, which could have

positive or negative relationships to SA Objectives 1, 2, 5, 9 and 14, depending on where development takes place in the Town Centre, and whether it affects biodiversity, geodiversity or heritage assets, or is in areas affected by exceedance of NO₂ emissions, or areas at risk of flooding. There is also uncertainty about the impact of most of these objectives on SA Objective 10 as more development in the Town Centre is likely to mean more waste generated, but it could also bring opportunities to provide the infrastructure needed to manage it.

2.4 Conclusions

The results of the objectives testing indicate there is a high degree of compatibility between the SAD and AAP objectives and the SA objectives.

The most significant potential conflicts identified are between the SAD objectives that would allow mineral extraction, and the SA Objectives that seek to conserve the natural and built environment. Similar conflicts also exist between the SA Objectives themselves (see Section 7.3, SA Scoping Report). This means that the SAD will need to adopt a balanced approach, to minimise the harm that mineral extraction may cause to environmental assets, while at the same time allowing mineral extraction to take place where it is necessary to support economic growth objectives.

The other areas of potential conflict or uncertainty identified are generally capable of being addressed at the next stage, and possibly in some cases by refining the plan objectives to make it clearer how the SAD and AAP Objectives relate to each other and to the SA Objectives. The Council's decisions about the "preferred options" for the SAD and AAP, including the site selection process, will need to take into account the potential tensions between the SAD and AAP Objectives and SA Objectives.

3. SAD Options Appraisal

3.1 Options for the SAD

The main function of the SAD is to deliver the development proposed in the Black Country Core Strategy (BCCS), and to address other local requirements where they are in conformity with the pattern of development (“spatial strategy”) identified in the BCCS. The Council has identified a wide range of issues that the SAD needs to address for different types of land use. In some cases, there is little or no choice over the approach in the SAD as this is dictated by the BCCS or by other policy.

However, in other cases there are choices to be made. As the Options Appraisal shows which of the options are likely to deliver sustainable development, either on their own, in combination with other options, or with the addition of mitigation and enhancement measures, it will help the Council to decide which sites should be included in the draft SAD produced at the next stage (“preferred options”). The outcome of the Issues & Options consultation will also have a significant influence, as people will have the opportunity to put forward new sites, and comment on the sites already identified as well as on the Options Appraisal. The options identified for the SAD are mostly about different ways of delivering the BCCS requirements. There are 17 sets of alternative options, 41 options in total.

The Options for the SAD are listed in the left-hand column of the matrix in Appendix D, which shows the results of the “high level” Options Appraisal we have carried out. Below we have summarised the key outcomes of the appraisal.

3.2 Appraisal Results - Overview

The results of the appraisal have shown that most of the Options for the SAD are likely to have positive or neutral effects on the SA Objectives listed in Appendix A. The significant positive and negative effects identified are summarised in Sections 3.3 and 3.4 below, although it should be noted that these and other options have also been identified as having less significant positive and negative effects. The

Option Appraisal was carried out by the Council in April 2013, and is subject to public consultation as well as further updating as the options are refined and more evidence becomes available on specific sites. We may therefore find that options identified now as having non-significant effects or neutral or uncertain effects, are refined and re-assessed as having significant effects at a later stage.

There is considerable uncertainty about the effects of some of the options on certain SA Objectives - the reasons for this are explained in Section 3.5. Examples of potential mitigation and enhancement measures that could address positive, negative and uncertain effects identified are set out in Section 3.6.

3.3 Positive Effects Identified

The Options Appraisal indicates that thirteen of the SAD Options are likely to have significant positive effects on SA Objectives. Table 2 below summarises the significant positive effects identified.

Table 2: SAD Options Appraisal – Summary of Significant Positive Effects

SAD Option	SA Objectives Affected	Reasons for Significant Positive Effects
Land for Industry Option 2	SA12	Option would involve making use of existing employment land and other previously-developed land for industrial development. It is therefore likely to maximise efficient use of land and bring derelict land back into beneficial use, including land affected by contamination and geotechnical problems.
Open Space Option 1	SA7, SA8	Option seeks to increase provision of open space in areas of deficiency and would have significant positive effects on communities who do not have access to good quality open spaces, who are also disproportionately affected by health problems linked to inactive lifestyles. It is also likely to have significant benefits for health.
Environmental Network Option 2	SA2, SA5, SA9	Option seeks to target investment in expanding and enhancing environmental infrastructure towards areas where the network is deficient. This approach is likely to have significant effects on the environmental assets included in the network, such as sites of importance for biodiversity and geodiversity, heritage assets and locally important landscape and townscape features.

SAD Option	SA Objectives Affected	Reasons for Significant Positive Effects
Waste Options 1b and 1c	SA10	Options propose waste management targets linked to delivery of infrastructure for re-use and recycling, whereas Option 1(a) would involve setting targets for any recovery infrastructure, which could include energy recovery (this sits below re-use and recycling in the “waste hierarchy”). These options are therefore likely to have significant positive effects on material resources as they would move waste up the “waste hierarchy.”
Waste Option 2b	SA10	This option seeks to safeguard all waste management facilities in the borough as opposed to just the “Strategic Sites” under Option 2a. It is therefore likely to have significant positive effects as it would give all sites a degree of protection.
Waste Option 3b	SA10	This option proposes to provide guidance on the types of waste facility suitable on different categories of employment land and open land in Walsall, whereas Option 3a would rely on existing national policy and local policy in the BCCS. Providing more guidance is likely to have significant positive effects on material resources as it will provide more certainty for the waste industry over where facilities could be built.
Minerals Options 1a – 1c	SA10	All three options would involve defining the boundary of a MSA in Walsall to which the existing BCCS Policy MIN1 would apply. This would provide greater certainty for those wishing to develop non-mineral land uses in the MSA and is therefore likely to have significant positive effects on the safeguarding of mineral resources.
Minerals Option 5a	SA10	This option would involve allocating land for mineral extraction if possible, and would therefore provide greater certainty than Option 5b which would not allocate land and would rely on the Areas of Search to identify suitable extraction areas. It is therefore likely to have significant positive effects in terms of allowing essential production of mineral resources to support economic growth.
Transport Option 1	SA13	This option would involve safeguarding land for key transport infrastructure projects, which would provide greater certainty that they could go ahead as it would prevent other development from encroaching on the land needed. It would therefore have significant positive effects on delivery of the transport infrastructure.
Utilities Option 1	SA3, SA11	This option would involve allocating land for renewable energy projects (biomass and wind) and if it is feasible it is likely to have significant positive effects on climate change mitigation and objectives to increase the proportion of energy generated from low carbon and renewable sources.

The SA of the BCCS indicates that the overall BCCS spatial strategy and the BCCS policies promote a sustainable pattern of development. The results of the SAD

Options Appraisal confirm this is also likely to be the case at a local level in Walsall, because they suggest that Options consistent with the BCCS spatial strategy are more likely to have positive effects on the SA Objectives.

For example, Housing Options 1 and 2, which involve developing housing on previously-developed land, perform significantly better against most of the SA Objectives than Housing Option 3, which involves developing housing on greenfield land, including land in the Green Belt. Options which are seeking to address existing problems, such as deficiencies in open space (Open Space Option 1), deficiencies in the environmental network (Environmental Network Option 2), and the potential cumulative impacts of mineral extraction (Minerals Option 6a) have also been identified as having positive effects on more than one SA Objective.

3.4 Negative Effects Identified

The Options Appraisal indicates that six of the SAD Options are likely to have significant negative effects on SA Objectives. Table 3 below summarises the significant negative effects identified.

Table 3: SAD Options Appraisal – Summary of Significant Negative Effects

SAD Option	SA Objectives Affected	Reasons for Significant Negative Effects
Housing Option 3	SA9, SA12, SA13	Option would lead to loss of open land, inefficient use of land (particularly if alternative previously-developed land is available), and would increase car dependency as it would involve developing housing in peripheral locations not well connected to public transport networks.
Land for Industry Option 4	SA9, SA12, SA13	Option would lead to loss of open land, inefficient use of land (particularly if alternative previously-developed land is available), and would increase car dependency as it would involve developing industry peripheral locations not well connected to public transport networks or to the urban areas where the local workforce is likely to be living.
Minerals Option 3b	SA2	Option would involve identifying a second area of search for brick clay (Etruria marl) extraction in an area that is partly designated as a SSSI (Jockey Fields). It is therefore likely to have significant harmful effects on biodiversity.

SAD Option	SA Objectives Affected	Reasons for Significant Negative Effects
Minerals Options 4a – 4c	SA2, SA4, SA9	All three options are likely to have significant harmful effects on biodiversity because they are within the “area of influence” of the Cannock Extension Canal SAC, and whichever option is chosen would involve mineral extraction within a SINC (Brownhills Common and The Slough) which is also near to a SSSI (Chasewater and the Southern Staffordshire Coalfields). Option 1c also has the potential to have significant harmful effects on amenity and landscape, as it covers a wider area than the other two options and part of it is close to a residential area.

It has been noted above that there is correlation between the results of the Options Appraisal and the extent to which Options conform to the BCCS spatial strategy. Options that conflict with the strategy have been found to have negative effects on the SA Objectives. The reasons for options for the SAD to score negatively can be summarised as follows:

- Potential negative effects on access to key facilities and services, including open space (Housing Option 3, Land for Industry Option 4, Out-of-Centre Developments Option 1);
- Potential negative effects on amenity and/ or on highway network from increased number of trips by car, delivery or heavy goods vehicles (Housing Option 3, Land for Industry Options 2 – 4, Brick Clay (Etruria Marl) Supply Option 3b, Mineral Site Allocations Options 5a and 5b, Limiting the Impacts of Mineral Extraction Options 1a and 1b);
- Potential negative effects from traffic congestion and increased traffic emissions and energy consumption on air quality and/ or climate change (Housing Option 3, Land for Industry Options 1 – 4, Out-of-Centre Developments Option 1);
- Potential negative effects on historic environment from development of new transport infrastructure (Transport Option 1);

- Potential negative effects on biodiversity, landscape and/ or land quality due to loss of open space and other greenfield land (Housing Options 2 and 3, Land for Industry Options 3 and 4, Open Space Option 3, Brick Clay (Etruria Marl) Supply Options 3a and 3b, Fireclay Supply Options 4a – 4c, Mineral Site Allocations Options 5a and 5b, Limiting the Impacts of Mineral Extraction Options 1a and 1b); and
- Potential negative effects on the local economy from lack of investment or diversion of investment to less sustainable locations (Local Centres Option 1, Out-of-Centre Developments Option 1).

3.5 Uncertain Effects Identified

The main areas of uncertainty are effects on sites of importance for biodiversity, cultural heritage, landscape and townscape, and flood risk, for SAD options that are either not site-specific, or include a large number of sites, not all of which are likely to be selected, so there is some choice over whether there would be impacts or not. It is only possible to establish effects with reasonable confidence for those options that are site or area-specific such as the options for the minerals areas of search.

There are also uncertainties around physical constraints affecting some sites. These could in some cases affect viability and delivery of the land use proposed. If this was the case, it could also have consequential effects on other objectives, such as delivery of affordable housing, open space and environmental enhancements, as provision of these is partly dependent on development of market housing schemes being able to provide them or part fund them.

As development viability can be an issue on sites with abnormal costs (e.g. land where remediation is required), it may not be possible to meet these requirements on every housing site identified that falls within the existing BCCS and UDP policy thresholds. The site selection process will therefore need to consider carefully which combination of sites is best placed to meet all of the BCCS requirements, taking into account what each one is likely to be capable of delivering.

In some cases, new evidence is likely to come forward that will help the Council to decide what the “preferred options” should be. For example, the consultation and engagement on the Issues & Options could flag up all sorts of potential effects we have not yet identified, which will need to be taken into account. For example, comments from the statutory “SEA bodies” (Environment Agency, English Heritage, Natural England) on the potential environmental effects of Options for the SAD will need to be taken into consideration. Under the “duty to co-operate” the Council is obliged to engage actively with these and other bodies (including other planning authorities where relevant) on cross-boundary effects, so we anticipate that where such effects are possible they will be identified.

The Habitats Regulations Assessment (HRA) which has been commissioned will consider whether any of the options or site specific proposals for the SAD could cause harm to the integrity of a European Site. The outcome of the HRA an important consideration in deciding what land uses certain sites can be allocated for some sites, or whether they can be allocated at all, if there are no practicable or feasible mitigation measures that would prevent harm.

Another area where new evidence is expected to inform the choice of options is flood risk. The Black Country Strategic Flood Risk Assessment identifies some areas of the borough as being at risk of flooding (within Flood Zones 2 and 3). The SAD must avoid allocating development in these areas if it is likely to present unacceptable risks to those who will be occupying the sites. The Council will be commissioning a local flood risk assessment and water cycle study to look at the risks in more detail than the BCCS studies. This will inform future stages of the appraisal, and will enable us to evaluate the risks of site specific options with greater confidence.

3.6 Potential for Mitigation and Enhancement

The following mitigation and enhancement measures have been identified:

- Potential negative or uncertain effects on SA Objectives 1 and 3 (reduction of CO₂ and NO₂ emissions) from expansion of industry and consequent increased traffic generation/ congestion and energy consumption could be

mitigated to an extent, by seeking high standards of energy efficiency in new buildings and optimising use of travel planning and low emission transport infrastructure;

- Where relevant, potential harmful effects on “European” (Natura 2000) sites (SA Objective 2) will be evaluated through the HRA;
- Potential negative or uncertain effects on SA Objectives 2, 5 and 9 (conservation and enhancement of environmental assets and environmental infrastructure network) can be mitigated through site selection – avoiding impacts or choosing areas of lesser value - and through the development management process; opportunities for enhancement can also be identified through these mechanisms;
- Potential negative or uncertain effects on SA Objective 4 (provision of housing including affordable housing) arising from employment land viability issues could be addressed by combining Land for Industry Options 1 and 2 and/ or by identifying alternative funding and delivery mechanisms;
- Potential negative or uncertain effects on SA Objectives 4, 6 and 7 (safeguarding employment land) from potential loss or relocation of businesses and jobs as a result of changes of use from employment land to housing can be mitigated through effective application of BCCS Policy DEL2;
- Potential negative or uncertain effects on SA Objectives 4, 7 and 9 (maintaining open space network that is accessible to all communities) from other development on surplus open space can be mitigated by ensuring that wherever possible, the new developments will deliver new, better quality areas of open space in locations that are more accessible for local communities;
- Potential negative or uncertain effects on SA Objectives 4, 7 and 13 (ensuring that local people have access to jobs, facilities and services) could be

mitigated by ensuring that housing sites are located near to public transport, cycling and walking routes or that public transport networks are improved and extended where necessary to serve them, and by ensuring that sites for industry, retail, leisure, education, health care, open space and other key facilities are well-related to the communities they are intended to serve; and

- Potential negative or uncertain effects on SA Objective 14 (managing flood risk) can be mitigated by subjecting all sites considered for allocation to the "sequential test," which will be informed by the BCCS Strategic Flood Risk Assessments supplemented by local assessments.

4. AAP Options Appraisal

4.1 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. There are many more options for the AAP than there are for the SAD – 39 sets of alternative options, 125 options in total. The AAP Options are 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.

4.2 Appraisal Results - Overview

The results of the appraisal have shown that most of the Options for the AAP are likely to have positive or neutral effects on the SA Objectives listed in Appendix A. The significant positive and negative effects identified are summarised in Sections 4.3 and 4.4 below. Other (less significant) positive and negative effects are also likely to arise from these and other options – for details, see Appendix E. As this is the first stage in the appraisal process it is only a “snapshot” of the effects identified in April 2013. Options that have been assessed as not significant, neutral or uncertain could be re-assessed as having significant effects when options are refined and more information on specific sites is available.

As with the options for the SAD, there is considerable uncertainty about the effects of some of the options on certain SA Objectives, but for slightly different reasons – see

Section 4.5 for details. Examples of potential mitigation and enhancement measures that could address positive, negative and uncertain effects identified are summarised in Section 4.6.

4.3 Positive Effects Identified

The Options Appraisal indicates that twenty-two of the Options for the AAP are likely to have significant positive effects on SA Objectives, in some cases, on several SA Objectives. Table 4 below summarises the significant positive effects identified.

Table 4: AAP Options Appraisal – Summary of Significant Positive Effects

AAP Option	SA Objectives Affected	Reasons for Significant Positive Effects
Housing Option 1	SA4, SA13	Option is to allocate additional sites in the Town Centre for residential development. This option would therefore be providing new housing in a location that was highly accessible to employment, shops and the other services and amenities in the Town Centre, as well as contributing towards Walsall's general housing requirements.
Residential Environments Option 1	SA4, SA9	Option proposes setting minimum standards for the quality of the residential environments created by new housing developments in the Town Centre. It would therefore ensure that the new housing provided would be of high quality, well-designed, and having positive effects on quality of life as well as on the townscape.
Education and Health Option 1	SA8, SA13	Option proposes that land be allocated to help deliver the future expansion requirements of the Manor Hospital, other health providers, and Walsall College. As the Town Centre is the most accessible location in the borough, this option would ensure that the health care and further education facilities provided would be accessible to most people living in the borough by a choice of transport modes including public transport.
Character Options 1 and 3	SA5, SA9	Under Option 1, buildings important to the character of the Town Centre would be identified in the AAP and would be protected by policies. Under Option 3, the AAP would include measures to consolidate and enhance the four "character areas" identified in the AAP Issues & Options Report. Both options would therefore involve a positive and pro-active approach towards protecting the character of the Town Centre, and protecting and conserving the historic environment.

AAP Option	SA Objectives Affected	Reasons for Significant Positive Effects
Design Options 3 and 6	Option 3 - SA5, SA9 Option 6 - SA3, SA11	Under Option 3, the AAP would seek exemplar design standards for new buildings in prominent locations, which is likely to improve the quality of the built environment generally as well as setting standards for other developments to follow, supporting SA5 and SA9. Under Option 6, the AAP would allocate land for large scale renewable energy projects such as a combined heat and power facility, which would contribute towards targets for carbon dioxide reduction and renewable energy generation, supporting SA3 and SA11.
Investment Options 1 - 5	Option 1 – SA6, SA12, SA13 Option 2 – SA13 Option 3 – SA6 Option 4 – SA3, SA10, SA11, SA14 Option 5 – SA9	These options relate to the scope of the policy guidance provided in the AAP on the development of the “Big Three” sites and Park Street. Option 1 proposes that they should be promoted as key development opportunities, Option 2 that the AAP would set out a vision for development and specify the land uses that could be developed in each one, Option 3 that the AAP would be flexible about the land uses allowing the market to lead, Option 4 that the AAP would set exemplar environmental standards for development of the sites, and Option 5 that the AAP would set exemplar design standards. Each of these options would have significant positive effects on different SA Objectives. For example, Option 3 would only support SA6, and Option 2 would only support SA13, whereas Option 1 would support SA6, SA12 and SA13, and Options 4 and 5 would support different environmental objectives.
Old Square Options 1 - 3	Option 1 – SA6, SA12, SA13 Option 2 – SA6, SA13 Option 3 – SA13	These options relate to the strategy for the Old Square Shopping Centre. Under Option 1 the AAP would seek to retain it as a primarily retail location, under Option 2, the AAP would identify it as an opportunity for expansion/ redevelopment to provide larger retail units, and under Option 3, the AAP would identify it as an development opportunity for a variety of “town centre” land uses. All three options would therefore retain this highly accessible site as a location for “town centre” uses, supporting SA13. Option 1 would retain the existing building and would therefore be a particularly efficient use of land, supporting SA12, whereas Options 2 and 3 would allow remodelling and extension or redevelopment. As Option 3 would allow greater flexibility over the land uses permitted, unlike the other two options, it could impact on delivery of BCCS comparison retail floorspace targets for the Town Centre, so the effects on SA6 may not be significant.
Shannon’s Mill Option1	SA6	This Option proposes that AAP identify the Shannon’s Mill “front site” to remain as a primarily retail location, which would therefore support BCCS comparison retail targets for the Town Centre.

AAP Option	SA Objectives Affected	Reasons for Significant Positive Effects
Gigaport Option 1	SA6	This Option proposes that AAP identify the Gigaport as Walsall's business district for development of large office accommodation and associated land uses, which would therefore support BCCS office floorspace targets for the Town Centre.
Waterfront North Option 1	SA6, SA13	This Option proposes that AAP allocate the Waterfront North site for development of leisure facilities and similar land uses, such as a cinema and conferencing facilities, which would mean providing these key facilities in a location accessible to most people living in the borough by a choice of transport modes including public transport.
Waterfront Lex Option 1	SA6	This Option proposes that AAP allocate the Waterfront Lex site for development of leisure facilities, such as conferencing/ banqueting facilities, which would have a positive effect on the regeneration of the Town Centre.
Park Street Options 1 and 2	SA6, SA7, SA13	Option 1 proposes that AAP identify and promote Park Street as the key location in Walsall for retail uses, whereas Option 2 proposes that Park Place Shopping Centre and the Saddlers' Centre be allocated for retail-led development. Both options would therefore support retail development and investment in the main shopping street within the strategic centre, the most accessible location in the borough, and would also support the BCCS comparison retail floorspace targets for the Town Centre.
Flood Risk Management Option 1	SA14	This Option proposes that the AAP takes a strategic approach to integrating water management infrastructure, such as Sustainable Urban Drainage Systems (SUDS), into the design of the public realm in the Town Centre, and would therefore support national policy objectives and BCCS policy towards flood risk management.

The SA of the BCCS indicates that the four strategic centres, the “hubs” of the “growth network,” are the most appropriate and sustainable locations for the development of new shops, offices and leisure facilities in the Black Country. The results of the AAP Options Appraisal confirm this is also likely to be the case at a local level in Walsall, because they suggest that Options for Walsall Town Centre which are consistent with the BCCS spatial strategy and objectives for the strategic centre are more likely to have positive effects on the SA Objectives.

For example, options that propose identifying specific sites or areas in the Town Centre for specific “town centre “ uses, and which propose a more pro-active and positive approach towards regeneration and investment (e.g. Location of New Retail

1, Culture and Leisure Options 4 and 6, Investment Option 1, Old Square Option 1) generally score positively against more of the SA Objectives than alternative Options that would allow greater flexibility. The main exception to this is the options for Industrial Uses, where Option 1 (safeguarding existing industrial areas) does not score as positively as Option 2 (allow incremental change), due to concerns about how industry will impact on other uses.

Options that would deliver more environmental and social benefits (e.g. Leisure Facilities Option 2, Cultural and Community Facilities Option 1, Environmental Option 1, Investment Option 4) also tend to score positively against more of the SA Objectives than alternative Options that would not deliver such benefits, but not always significantly so, because of uncertainties about viability and other potential effects that might be less positive (see 4.5 below).

4.4 Negative Effects Identified

Only two of the AAP Options are likely to have significant negative effects on SA Objectives. Table 4 below summarises the significant negative effects identified.

Table 4: AAP Options Appraisal – Summary of Significant Negative Effects

AAP Option	SA Objectives Affected	Reasons for Significant Negative Effects
Town Centre Boundary Option 1	SA5, SA9	This option would involve contracting the boundary of the Town Centre, and is likely to lead to higher density development/ "town cramming," which would have significant adverse effects on the townscape and character of the Town Centre.
Leisure Facilities Option 5	SA6, SA7, SA8	Under this option the AAP would not make any provision for leisure facilities in the Town Centre. This is likely to have significant negative effects on the vitality and competitiveness of the Town Centre, on access to key facilities and services (given that the Town Centre is the most accessible location in the borough), and on health and well-being as people who rely on public transport and need to have facilities provided in a central and accessible location would be excluded from having access to them.

Considering how many options there are for the AAP it is striking that very few of them have been assessed as having potential negative effects at this stage. The reasons for options to score negatively are, in summary:

- Potential negative effects on access to key facilities and services (Leisure Facilities Options 1 and 5, Cultural and Community Facilities Options 5 and 8, Location of Leisure Option 3);
- Potential negative effects on investment in the centre and regeneration of the centre (PSA Option 3, Leisure Facilities Option 1, Car Parking Option 3);
- Potential negative effects on historic environment, character and townscape from new development (PSA Options 2 and 3, Housing Option 4, Pedestrianisation Option 2, Public Transport Option 1);
- Potential negative effects from traffic congestion and increased traffic emissions on air quality and climate change (Location of Retail Option 3, Location of Offices Option 1, Road Network Option 3);
- Potential negative effects on objectives to encourage improved standards of environmental sustainability in new developments (Design Option 4); and
- Potential negative effects on amenity of people living in and near the Town Centre (Industrial Uses Option 1, Housing Option 1).

4.5 Uncertain Effects Identified

One of the most important uncertainties we have identified in relation to the options for the AAP is how the market might react to significant changes to land use policy, (e.g. the boundary of the Town Centre, the boundary of the Primary Shopping Area, the pattern of land use within the Town Centre), and how such changes might impact on investment in the Town Centre and the pattern of land use going forward. It will be crucial for the Council to understand the likely effects as far as possible, and if

necessary to take appropriate advice before making such changes, to avoid potentially damaging consequences such as over-intensive development in some areas and lack of development in others, development migrating to the periphery, or lack of investment in key infrastructure or in the Town Centre generally.

Other uncertainties include the potential environmental and amenity effects of Options that are either not site-specific or do not indicate the overall scale and form of development. Such options could have effects on air quality, carbon dioxide emissions, amenity of residents, cultural heritage, amenity and townscape, energy consumption, traffic generation and congestion, pedestrian access, access for people with disabilities and flood risk or a combination of some of these effects, depending on where development takes place in the Town Centre and what form of development takes place.

For example, there are uncertainties about the quality of the residential environment that could be provided in the Town Centre if more housing sites were allocated and if more entertainment venues open in the evening were introduced, and about the impact of encouraging large-scale office and retail development on buildings and areas important for cultural heritage and local character. The options evaluation process will need to give further consideration towards how these changes might interact with each other and existing development, what positive and negative effects could arise, and how potential negative effects could be mitigated (see Section 4.6 below) before any decisions are made.

As is noted above in relation to the SAD, some new evidence is likely to come forward that will help the Council to decide what its “preferred options” are. For instance, parts of the Town Centre are known to be at risk of flooding, and the AAP must avoid allocating development in these areas if it is likely to present unacceptable risks to those who will be occupying the site. The proposed local flood risk assessment and water cycle study will inform future stages of the appraisal, and will enable us to evaluate the risks of some of the AAP Options with greater confidence. Future air quality monitoring reports may also help us to identify which options could have further impacts on NO₂ emissions.

Consultation and engagement with groups such as Walsall Disability Forum and local community groups will also help us to identify whether options for the Town Centre or particular parts of the Town Centre could have effects on accessibility for people with disabilities, effects on other groups, or impacts on the amenity of local communities. This will help the Council identify mitigation and enhancement measures needed across the Town Centre or on specific sites so that developments are inclusive, and where possible improve accessibility to, from within and around the Town Centre, and improve the quality of the environment. Comments from the statutory “SEA bodies” (Environment Agency, English Heritage, Natural England) are also likely to help to identify environmental effects of Options for the AAP.

4.6 Potential for Mitigation and Enhancement

The SA of the AAP has identified similar measures to those identified for the SAD, but also some measures that are more specific to the AAP and its particular role in regenerating the Town Centre. The potential measures identified are:

- Potential negative or uncertain effects on SA Objectives 1 and 3 (reduction of CO₂ and NO₂ emissions) of increased traffic generation and congestion in parts of the Town Centre where NO₂ limit values are already being exceeded could be mitigated to an extent, by seeking high standards of energy efficiency in new buildings in these areas and optimising use of travel planning and low emission transport infrastructure;
- Potential negative or uncertain effects on SA Objectives 4, 7 and 13 (ensuring that new “town centre” development is accessible to those it is intended to serve) from encouraging development at sites like Gigaport which are not well connected to the main transport hubs in the Town Centre could be mitigated by improving public transport links to these sites where feasible;
- Potential negative or uncertain effects on SA Objective 6 (Town Centre to be the principal location for major retail, office and leisure development) from continued trends or changes that deter investment could be mitigated or

avoided by better understanding the dynamics of the market and the types of investment that could realistically be attracted to the Town Centre to stimulate growth in the short-term without compromising its environmental quality or its attractiveness to potential investors in the long-term;

- Potential negative or uncertain effects on SA Objective 6 (Town Centre to be the principal location for major retail, office and leisure development) from potential loss of key facilities such as Gala Baths, or from failure to provide key facilities we lack such as a cinema and a major performance venue, could be mitigated by identifying other accessible site in the Town Centre or elsewhere for new or replacement facilities and/ or by identifying a provider for such facilities;
- Potential negative or uncertain effects on SA Objectives 4, 5 and 9 (ensuring new developments have a positive effect on quality of life for existing and potential future residents, conserving and enhancing the historic environment and buildings and townscapes of local character through good design) can be mitigated to an extent through site selection or some form of “zoning” (steering certain land uses to specific areas of the Town Centre), but as there is a limited choice of sites, mitigation may have to be mainly through the development management process; opportunities for enhancement can also be identified through these mechanisms; and
- Potential effects on SA Objective 14 (managing flood risk) can be mitigated by subjecting all sites considered for allocation to the "sequential test," which will be informed by the BCCS Strategic Flood Risk Assessments supplemented by local assessments.

5. Conclusions

5.1 Overview of Potential Significant Effects

A large number of the AAP Options, and some of the SAD Options, are likely to have significant positive effects. Very few significant negative effects have been identified for any of the SAD and AAP Options. Most of the effects identified are either positive or neutral. The main effects we have identified can be summarised as follows:

- Some of the options for the SAD would have significant negative effects on SA Objectives 4 and 13, because they propose development on greenfield sites that are not well-connected to existing public transport networks, which would not give people a genuine choice over how they travel to work, to shop or for leisure, and may exclude people who do not have access to a car.
- Some of the options for the SAD would have significant negative effects on SA Objectives 9 and 12 because they involve development on greenfield land that would be harmful to the landscape, or would not be an efficient use of land if suitable alternative previously-developed sites are available.
- Some of the mineral options for the SAD would have significant negative effects on SA Objective 2 because they would be harmful to sites of importance for biodiversity.
- Several of the options for the SAD are likely to have significant positive effects on SA Objectives 2, 3, 5, 7, 8, 9, 10, 11, 12 and 13 because they propose a pattern of development consistent with the BCCS spatial strategy and sustainability principle of “brownfield first.”
- Several of the options for the SAD and AAP are likely to have significant positive effects on SA Objectives 2, 5, 7, 8 and 9 because they seek to address existing environmental problems, such as local deficiencies in open space and other environmental infrastructure, and flood risk.

- Several Options for the AAP would have significant positive effects on SA Objective 6 and 13, because they would deliver “town centre” development on appropriate sites in the strategic centre, in support of the BCCS targets for comparison retail and office floorspace development, and in support of the regeneration of the Town Centre for the benefit of the borough’s economy.
- Several Options for the AAP would have significant positive effects on SA Objectives 3, 5, 9, 10, 11 and 12 because they would deliver development that would address a range of environmental sustainability issues such as good design, energy, water and resource efficiency, land remediation, and enhancement of the built environment and townscape.
- Several Options for the AAP would have significant positive effects on SA Objectives 4, 6, 7 and 13, because they would deliver “town centre” developments including retailing, offices, leisure, health care and further education services in a highly accessible location, giving most people living in Walsall a genuine choice over how they travel to these facilities.

5.2 Uncertain Effects - Issues Relating to Constraints and Viability

Some of the uncertain effects we have identified are due to physical constraints which may affect the viability of development on some sites in the borough (see Chapters 12 and 13 of the SAD Issues and Options Report and Chapters 10 and 11 of the AAP Issues and Options Report), and therefore might affect the impacts if mitigation is not feasible.

Even where we can identify mitigation measures that would help to alleviate harmful effects, such as those identified above, they will not always be feasible on sites with significant constraints and problems (e.g. where land remediation is required), particularly if they are likely to add further to development costs. Difficult decisions may therefore have to be made at the next stage in plan preparation, over whether

the benefits of allocating a site to meet BCCS development requirements outweigh any harm that it would cause to sustainability.

5.3 Uncertain Effects - Issues Relating to Evidence

Some of the effects we have considered are uncertain because at this stage in the process a lot of the options are about the general approach rather than about specific sites, so we may not be able to tell what the impacts of the options are likely to be, until there is more certainty about which sites are included. In some cases more evidence will become available and this will help to clarify the effects of different options and development on specific sites. At the next stage the Council will be refining the options in the light of any new evidence that comes forward, and the SA will play an important role in identifying the options or combination of options most likely to deliver the BCCS requirements in the most sustainable manner without compromising the BCCS spatial strategy.

5.4 Next Stages – Key Issues for SAD and AAP Preferred Options

The results of the SA will be reviewed following the consultation and the advice from the Council's SA consultant. This will be an important pointer towards the options, or combination of options, that are likely to deliver sustainable development and be most beneficial for the environment, equality and diversity and health and well-being.

The Council cannot possibly appraise every site under consideration for allocation or designation in the SAD and AAP individually. The Issues and Options Reports already identify hundreds of sites, including more than 90 "Choices Sites" that could be allocated for more than one land use, and more are likely to be identified as the plans progress. The Council is therefore proposing a more proportionate approach, which takes into account the number of sites under consideration and the SA already carried out on the BCCS, which has established that the broad pattern of development (spatial strategy) that the SAD and AAP will be adopting is sustainable.

The proposed approach towards site appraisal is as follows:

- **Sites within the BCCS “growth network” will not be subject to further appraisal where the proposed land use is consistent with BCCS policy unless a specific proposal could have significant effects which have not previously been appraised** - the BCCS spatial strategy and policies were subject to SA when the BCCS was prepared, and no harmful effects were identified;
- **Sites on previously-developed land outside the BCCS “growth network” will only be subject to further appraisal if the proposed land use is not consistent with the pattern of land use shown on BCCS Topic Diagrams, or if it could have significant effects which have not previously been appraised** – the BCCS Key Diagrams and policies were subject to SA when the BCCS was prepared, and no harmful effects were identified;
- **All sites proposed for “town centre” development on edge-of-centre or out-of-centre sites will be subject to SA** – the proposer of such developments will be requested to undertake their own appraisal;
- **All sites proposed for development on greenfield land (including land in the Green Belt) will be subject to SA** – where appropriate, groups of sites may be appraised together, sites will only be individually where there is a choice to be made between alternative sites, or where a greenfield site has been put forward which is not supported by the Council – in the latter case, the proposer will be requested to undertake their own appraisal;
- **All sites being considered for allocation for mineral extraction and for strategic waste management sites will be subject to SA** – these proposals have the potential for significant harmful effects, but as it is a requirement of national and local policy to make provision for these land uses, the Council will carry out assessments of individual sites, including sites already identified in the BCCS, so that all appraisals are consistent.

Appendix A

SAD and AAP SA Objectives	
SA1	Air Quality - Minimise emissions of potentially harmful air pollutants from new development in Walsall and exposure to poor air quality in the parts of Walsall Borough where the national air quality objectives for NO ₂ are not being met.
SA2	Biodiversity and Geodiversity - conserve, protect, enhance and restore Walsall's biodiversity and geodiversity by ensuring that new development does not harm the integrity of European Sites or cause further loss of designated sites or other important wildlife habitats and geological features, and by identifying opportunities for new habitat creation.
SA3	Climate Change - minimise Walsall's contribution towards climate change and adapt to the unavoidable effects of climate change on the Borough, by promoting low carbon/ low emission developments and by identifying opportunities to mitigate the anticipated effects on key infrastructure and other important assets.
SA4	Communities and Population - support the development of strong, sustainable and inclusive communities in Walsall by developing high quality housing that reflects local housing needs in attractive locations that are accessible to employment and social infrastructure, and by ensuring that other new developments will have a positive effect on the quality of life for local communities.
SA5	Cultural Heritage - conserve, protect and enhance Walsall's cultural heritage by encouraging better management of conservation areas and historic parks and gardens, by identifying appropriate, viable and beneficial uses for vacant historic buildings, and by ensuring that new development does not compromise the quality or character of heritage assets and their settings or destroy features or archaeology of national or local importance.
SA6	Economy and Centres - promote sustainable, low carbon economic growth and retain businesses and jobs in Walsall by identifying and safeguarding sufficient land for employment and training of the right quality in accessible locations to meet the needs of local businesses and potential investors, and by identifying opportunities for retail, office and leisure development in centres to meet anticipated requirements.
SA7	Equality and Diversity - reduce inequality by ensuring that the diverse needs of communities in Walsall are considered when planning housing and other developments to be used by the public, by ensuring that specific needs are addressed where possible, by supporting development that would help reduce poverty and social and economic deprivation, and by improving access to key services and facilities.
SA8	Health and Wellbeing - improve the health and well-being of Walsall residents and address health inequalities by ensuring that new development supports healthy lifestyles and wellbeing and does not present unacceptable risks to health, and by ensuring that health and social care facilities are accessible to those they are meant to serve.
SA9	Landscape and Townscape - conserve, protect and enhance the landscape and townscape by developing an environmental infrastructure network for Walsall that protects valued areas and provides opportunities to improve areas of lesser quality, and by ensuring that new development is well designed, of a type and scale appropriate to its surroundings, and respects the character of buildings, spaces and other features where they contribute positively to the environment.
SA10	Material Resources - use Walsall's material resources prudently and efficiently and in ways that will protect the environment and human health, by safeguarding mineral resources and mineral and waste infrastructure, by addressing identified mineral supply requirements, and by supporting proposals likely to reduce waste and provide the infrastructure needed to manage unavoidable waste arising in Walsall in ways that will make optimum use of resources and divert as much as possible away from landfill.
SA11	Renewable and Low Carbon Energy - reduce Walsall's reliance on non-renewable, carbon based energy sources, by minimising energy consumption, by increasing the capacity available to generate energy and fuel from renewable and low carbon sources, and by delivering more affordable, secure and reliable supplies of energy to local communities and businesses.
SA12	Soil and Ground Conditions - maintain and improve the quality of Walsall's soils and land, by encouraging development that uses land and buildings efficiently or brings previously developed and derelict land back into beneficial use, and by ensuring that new development deals with existing contamination and geotechnical problems and does not exacerbate existing problems or cause such problems on land not already affected.
SA13	Transport and Accessibility - deliver the transport infrastructure required to improve connectivity, reduce congestion and support economic growth in Walsall, reduce the impacts of transport on the environment and on the amenity and well-being of local communities, and ensure that new employment and social infrastructure is accessible to local people by a choice of transport modes, and encourages them to make smarter and healthier transport choices.
SA14	Water Environment - Conserve and protect Walsall's water resources, maintain water quality and reduce the risk of flooding, by minimising water consumption, by avoiding development in areas where water resources are present or areas at risk of flooding, by ensuring that new development will not have adverse impacts on hydrology and that any waste water generated can be managed in ways that minimise the risk of flooding and pollution of surface and groundwater.

Appendix B: SAD Objectives Testing Matrix and Commentary

SAD Objectives Testing Matrix - Outcomes														
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Walsall Site Allocation DPD Objectives														
SAD OBJECTIVE 1: To allocate high quality employment land in the best locations, allowing existing businesses to expand and new businesses to locate in the Borough.	+	+	+	+	++	++	+	0	0	0	0	++	+	+
SAD OBJECTIVE 2: To retain local quality employment land in long-term employment use, to enable existing businesses to stay in Walsall.	0	+	-	-	+	+	+	0	0	0	-	+	+	-
SAD OBJECTIVE 3: To deliver sustainable communities through the development of new housing on vacant, derelict, and under-used land, and redundant employment land, as well as the regeneration of existing housing areas.	?	+	+	++	++	++	++	+	+	+	+	++	++	?
SAD OBJECTIVE 4: To encourage and direct investment of a suitable scale to Walsall's local centres.	+	0	++	+	+	++	++	++	+	+	+	+	++	0
SAD OBJECTIVE 5: To provide a high quality environment across Walsall by defining integrated environmental networks, including areas of urban open space for recreation.	+	++	++	++	++	+	+	++	++	0	+	+	+	0
SAD OBJECTIVE 6: To protect and enhance existing natural and built environmental assets of national and local importance in Walsall.	+	++	++	0	++	0	0	0	++	-	0	++	0	+

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SAD OBJECTIVE 7: To deliver a first class transport network.	+	0	+	+	0	+	+	+	0	0	+	0	++	0
SAD OBJECTIVE 8: To deliver a network of high quality community services accessible to all communities within Walsall.	0	0	0	++	0	+	++	++	0	0	0	0	++	0
SAD OBJECTIVE 9: To identify opportunities for the development of waste management facilities in employment areas and in other suitable and accessible locations in Walsall.	0	0	0	0	0	+	0	0	0	++	+	0	0	0
SAD OBJECTIVE 10: To identify and safeguard mineral resources of national and local importance and identify suitable sites and areas for mineral extraction and production of secondary and recycled materials.	-	-	0	-	-	0	0	0	-	++	0	-	-	-

Key to the Objectives Testing Matrix Outcomes	
Likely strong compatibility	++
Likely compatibility	+
Relationship likely to be neutral	0
Likely incompatibility	-
Likely strong incompatibility	--
Compatibility uncertain	?

SAD Objectives Testing - Commentary

<p>SAD OBJECTIVE 1: To allocate high quality employment land in the best locations, allowing existing businesses to expand and new businesses to locate in the Borough.</p>	<p>No areas of tension have been identified between SAD Objective 1 and the SA Objectives, assuming "best locations" means previously-developed land within the "growth network" (regeneration corridors) and free-standing employment areas (such as Aldridge) identified on the BCCS Economy Key Diagram. This objective is also complementary to SAD Objective 2 which seeks to retain Local Quality Employment Sites (see below).</p>
<p>SAD OBJECTIVE 2: To retain local quality employment land in long-term employment use, to enable existing businesses to stay in Walsall</p>	<p>The objective of retaining existing Local Quality Employment Sites in employment use may be a disincentive for existing businesses to redevelop and/or relocate businesses to more modern premises which are more likely to be energy and water efficient or to be generating their own energy on-site from low carbon or renewable energy sources, and could also prevent redevelopment of adjoining sites for other uses such as housing, creating potential tension between SAD Objective 2 and SA Objectives 3, 4, 11 and 14. Retaining historic industrial buildings in their original use is likely to be the best way of conserving them, and will also ensure the continued use of existing infrastructure in accessible locations.</p>
<p>SAD OBJECTIVE 3: To deliver sustainable communities through the development of new housing on vacant, derelict, and under-used land, and redundant employment land, as well as the regeneration of existing housing areas.</p>	<p>No areas of tension have been identified between SAD Objective 3 and the SA Objectives. Re-using vacant, derelict and under-used land and buildings is the most sustainable option when measured against most indicators. Some vacant and derelict land that might be developed for new housing lies in areas where limit values for emission of nitrogen dioxide are being breached, or are in areas at risk of flooding, so effects on SA Objectives 1 and 14 are uncertain. However, such sites are likely to be more accessible by public transport than greenfield sites. Developing the latter is likely to encourage greater car dependency and increase pollution, causing greater conflict with the SA Objectives.</p>
<p>SAD OBJECTIVE 4: To encourage and direct investment of a suitable scale to Walsall's local centres.</p>	<p>No areas of tension have been identified between SAD Objective 4 and the SA Objectives. Directing investment to existing centres is likely to be the most sustainable option in terms of impacts on carbon dioxide emissions, accessibility and the local economy compared to alternative objectives which would allow greater flexibility over where "town centre" development could locate. SAD Objective 4 is therefore complimentary towards most of the SA Objectives, in particular, SA Objectives 3, 6, 7, 8 and 13.</p>
<p>SAD OBJECTIVE 5: To provide a high quality environment across Walsall by defining integrated environmental networks, including areas of urban open space for recreation.</p>	<p>No areas of tension have been identified between SAD Objective 5 and the SA Objectives. Providing attractive areas of open space and "green" networks will particularly complement SA Objectives towards biodiversity, cultural heritage, climate change mitigation, access to key facilities and services, health and landscape (SA Objectives 2, 3, 4, 5, 8 and 9) and is also likely improve access to open space for communities that do not currently have adequate access, and to encourage walking and cycling, in support of SA Objectives 7 and 13.</p>
<p>SAD OBJECTIVE 6: To protect and enhance existing natural and built environmental assets of national and local importance in Walsall.</p>	<p>Enhancing the existing built and natural environment will particularly complement SA Objectives towards biodiversity, climate change mitigation, cultural heritage, townscape and landscape, and soils (SA Objectives 2, 3, 5, 9 and 12). However, there is likely to be a tension between this objective and SA Objective 10, which allows for some mineral extraction to support sustainable economic growth. Even though SA Objective 10 seeks to manage mineral resources in ways that will protect the environment, some harm to nature conservation sites in the mineral resource areas identified is unavoidable, though this could be mitigated through provision of replacement habitats.</p>
<p>SAD OBJECTIVE 7: To deliver a first class transport network.</p>	<p>No areas of tension have been identified between SAD Objective 7 and the SA Objectives. The objective could be particularly complimentary towards SA Objective 13, assuming that the objective seeks to deliver a network that will maximise use of rail freight, public transport, walking and cycling to move people, goods and services around the borough and beyond, and rather than encouraging the continued use and further expansion of the road transport network.</p>
<p>SAD OBJECTIVE 8: To deliver a network of high quality community services accessible to all communities within Walsall.</p>	<p>No areas of tension have been identified between SAD Objective 8 and the SA Objectives. Delivering community facilities in accessible locations - particularly where local people can get access to them using existing public transport, walking and cycling networks - will complement objectives towards sustainable transport and is also more likely to deliver reductions in emissions from road transport and benefits to health from walking and cycling than alternative objectives which would allow greater flexibility over where these facilities could locate. SAD Objective 8 is therefore complimentary towards most of the SA Objectives, and in particular, SA Objectives 3, 4, 7, 8 and 13.</p>
<p>SAD OBJECTIVE 9: To identify opportunities for the development of waste management facilities in employment areas and in other suitable and accessible locations in Walsall.</p>	<p>No areas of tension have been identified between SAD Objective 9 and the SA Objectives. It is particularly complimentary towards SA Objective 10 which seeks to manage material resources prudently and sustainably, and also likely to be complimentary towards SA Objective 11 as new facilities could be using waste to produce energy. There is currently no energy from waste facility in Walsall so this is a gap in existing waste management infrastructure provision that could be addressed by new developments. Assuming that waste management facilities are properly regulated and well managed, and are located as close as possible to the source of the waste they are managing and/ or the end users of recovered material, they are not likely to cause significant tension with other objectives. Some tension with SA Objective 13 is possible if new facilities in Walsall would be managing large quantities of waste from outside the area.</p>
<p>SAD OBJECTIVE 10: To identify and safeguard mineral resources of national and local importance and identify suitable sites and areas for mineral extraction and production of secondary and recycled materials.</p>	<p>There are several areas of tension between SAD Objective 10 and the SA Objectives, although it is complementary towards SA Objective 10 which supports sustainable use and production of mineral resources. Mineral resources can only be extracted where they are found, so there is very limited choice over where mineral extraction can take place. The resources in Walsall that are most likely to be economic to work are underlying greenfield sites in the Green Belt, some of which are of importance for biodiversity, have underlying water resources or may have other implications for hydrology, or could contain archaeological remains, thereby bringing SAD Objective 10 into conflict with SA Objectives 2, 3, 5, 9 and 14. The relationship to SA Objective 12 is likely to be negative in the short-term, but probably neutral in the long-term, provided that mineral extraction sites are well restored to a standard that does not create any geotechnical problems for the future. Extraction, processing and transport of minerals can also have significant impact on air quality and the environmental quality of the local area, creating tension with SA Objectives 1, 4 and 13, even though many of the potential negative impacts could be addressed by suitable mitigation.</p>

Appendix C: AAP Objectives Testing Matrix and Commentary

AAP Objectives Testing Matrix - Outcomes														
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Walsall Town Centre AAP Objectives														
AAP OBJECTIVE 1: Establish and allocate a series of high quality, ambitious and deliverable proposals for Walsall Town Centre that will enable Walsall to maximise its economic potential creating a thriving and prosperous centre that creates job opportunities for the residents of the borough.	?	?	0	+	?	++	++	0	?	?	0	0	++	?
AAP OBJECTIVE 2: Enhance and maximise Walsall's competitiveness for investment, both in its role as a sub-regional centre and in respect of competing with out-of-centre developments.	?	?	+	+	?	++	++	0	?	+	+	+	++	?
AAP OBJECTIVE 3: Increase the choice, quality and diversity of the town centre retail offer in order to meet the needs of all sectors of the population. To secure a mix of occupiers in the town centre through the provision of units of sufficient size and quality in suitable locations to meet the requirements of modern retailers.	?	?	0	+	?	++	++	0	?	?	0	0	++	?
AAP OBJECTIVE 4: Diversify and strengthen the economic base, promote new ways of working and deliver a strong office market that provides high standard office accommodation in suitable locations to meet the needs of existing businesses and to attract new businesses to the area, accompanied by training and conference facilities.	?	?	0	+	?	++	+	0	?	?	0	0	++	?
AAP OBJECTIVE 5: Strengthen the current cultural offer through increasing the mix of uses within the town centre such as a cinema, performance venues and community facilities (e.g. weddings and banqueting facilities), complemented by leisure uses such as restaurants, cafes and bars in order to provide an attractive centre for visitors both day and night.	?	?	0	0	+	++	+	0	?	?	0	0	++	?

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA12	SA14
AAP OBJECTIVE 6: Support businesses to increase employment opportunities, skills and aspirations through high quality jobs in a variety of sectors, supported by good links with education and training providers in the town centre.	0	0	0	+	0	++	+	+	0	?	0	0	+	0
AAP OBJECTIVE 7: Improve accessibility to and within the centre for all sectors of the community, through the provision of integrated transport and enhanced cycling and pedestrian links.	-	?	-	+	?	0	+	+	?	?	0	0	++	?
AAP OBJECTIVE 8: Protect areas and buildings of historical importance while delivering high quality sustainable design that is well integrated and encourages greater activity in the town centre with innovative and high quality design and architecture at the core.	0	+	+	+	++	?	0	+	++	0	+	0	?	+
AAP OBJECTIVE 9: Promote the sustainability of the centre by delivering environmental infrastructure and improvements that will deliver a range of benefits.	0	++	++	+	++	?	+	+	++	0	0	+	?	+
AAP OBJECTIVE 10: Transform the experience and perception of Walsall town centre for those who shop, work, visit, invest and live in Walsall through measures such as improved public realm, civic spaces, quality of place, pedestrian access and security alongside the active promotion of the centre and organisation of community events.	0	+	?	+	+	?	+	+	++	0	0	0	?	?

Key to the Objectives Testing Matrix Outcomes	
Likely strong compatibility	++
Likely compatibility	+
Relationship likely to be neutral	0
Likely incompatibility	-
Likely strong incompatibility	--
Compatibility uncertain	?

AAP Objectives Testing - Commentary

<p>AAP OBJECTIVE 1: Establish and allocate a series of high quality, ambitious and deliverable proposals for Walsall Town Centre that will enable Walsall to maximise its economic potential creating a thriving and prosperous centre that creates job opportunities for the residents of the borough.</p>	<p>No definite areas of tension have been identified between AAP Objective 1 and the SA Objectives. Walsall Town Centre is the most accessible location in the borough, having links by rail to other key centres and by bus to most parts of the borough. Delivering large-scale, high quality new developments in the Town Centre would mean that most of Walsall's residents - including those that do not have access to a car - could reach the jobs and services provided in these developments using existing transport networks. AAP Objective 1 is therefore highly compatible with SA Objectives 6, 7 and 13, compatible with SA Objective 4, and is also complementary with AAP Objectives 2 and 3. As this option is not site-specific, there is uncertainty about compatibility with SA Objectives 1, 2, 5, 9 and 14. Large-scale developments could affect heritage assets, conservation areas and water management - but whether or not they would do so would depend on the location of the new developments. With regard to air quality, statutory limit values for nitrogen dioxide (NO₂) are being exceeded in some areas on the fringes of the Town Centre, and investment in these areas could create tensions with SA Objective 1. Relationship with SA Objective 3 are likely to be neutral, given that the AAP objective relates to where development is located, rather than how much potentially carbon dioxide (CO₂) generating development will take place, which is dictated by the BCCS. There is also uncertainty about the relationship to SA Objective 10, although large-scale new developments have potential to include provision for in-house sustainable waste management.</p>
<p>AAP OBJECTIVE 2: Enhance and maximise Walsall's competitiveness for investment, both in its role as a sub-regional centre and in respect of competing with out-of-centre developments.</p>	<p>No definite areas of tension have been identified between AAP Objective 2 and the SA Objectives. There is a high degree of compatibility with SA Objective 6, which seeks to identify opportunities for retail, office and leisure development in centres, SA Objective 13, as the Town Centre is generally very well connected to transport networks, and SA Objectives 4 and 7, as increased investment in the Town Centre will have wider benefits for people who depend on the Town Centre for employment, shopping and services. It is also compatible with SA Objectives 3 and 11, as the Town Centre is the main location within the borough likely to have potential for low carbon and renewable energy district heating, power and cooling systems which are more likely to be viable if the centre becomes a focus for investment. In addition, it is compatible with SA Objective 10 and SA Objective 12, as investment could provide opportunities to remediate brownfield sites and address geotechnical problems arising from previous limestone mining activity (which could include prior extraction of coal on the western fringes of the Town Centre) and could also encourage the development of sustainable waste management infrastructure. AAP Objective 2 is also complimentary to most of the other AAP Objectives, as investment is essential to securing the mix of uses the Town Centre needs and improvements to transport and environmental infrastructure. As this option is not site-specific, there is uncertainty about compatibility with SA Objectives 1, 2, 5, 9 and 14, for the same reasons indicated under AAP Objective 1.</p>
<p>AAP OBJECTIVE 3: Increase the choice, quality and diversity of the town centre retail offer in order to meet the needs of all sectors of the population. To secure a mix of occupiers in the town centre through the provision of units of sufficient size and quality in suitable locations to meet the requirements of modern retailers.</p>	<p>No definite areas of tension have been identified between AAP Objective 3 and the SA Objectives. As with AAP Objective 2, there is significant compatibility with SA Objectives 4, 6, 7 and 13, given that the Town Centre is a highly accessible central location, so increasing the range of shops and facilities available will bring a wide range of economic and social benefits. As with AAP Objective 1, there is uncertainty about compatibility with SA Objectives 5, 9 and 14, as large-scale developments could affect heritage assets, conservation areas and water management. As this option is not site-specific, there is uncertainty about compatibility with SA Objectives 1, 2, 5, 9 and 14, and relationship to SA Objective 3 is considered neutral, for the same reasons indicated under AAP Objective 1. There is also uncertainty about the relationship to SA Objective 10, although encouraging more shops/ a wider range of shops is likely to increase the amount of "municipal" waste generated by businesses in the Town Centre.</p>
<p>AAP OBJECTIVE 4: Diversify and strengthen the economic base, promote new ways of working and deliver a strong office market that provides high standard office accommodation in suitable locations to meet the needs of existing businesses and to attract new businesses to the area, accompanied by training and conference facilities.</p>	<p>No definite areas of tension have been identified between AAP Objective 4 and the SA Objectives. There is significant compatibility between this objective and SA Objectives 6 and 13, given that the Town Centre is the most accessible location in the borough, and will support SA objectives towards economic growth and "town centre" development in existing centres. Alternative objectives to locate offices elsewhere, such as on the periphery of the borough, would create significant tensions with the SA objectives. On the whole this objective is also compatible with SA Objectives 4 and 7, as it would provide office jobs that are accessible - in physical terms - to most people in the borough, though whether they could actually take advantage of such jobs would depend on the skills and qualifications needed. As this option is not site-specific, there is uncertainty about compatibility with SA Objectives 1, 2, 5, 9 and 14, and relationship to SA Objective 3 is considered neutral, for the same reasons indicated under AAP Objective 1. There is also uncertainty about the relationship to SA Objective 10, although encouraging office development is likely to increase the amount of "municipal" waste generated by businesses in the Town Centre.</p>

<p>AAP OBJECTIVE 5: Strengthen the current cultural offer through increasing the mix of uses within the town centre such as a cinema, performance venues and community facilities (e.g. weddings and banqueting facilities), complemented by leisure uses such as restaurants, cafes and bars in order to provide an attractive centre for visitors both day and night.</p>	<p>No definite areas of tension have been identified between AAP Objective 5 and the SA Objectives. There is significant compatibility between this objective and SA Objectives 6 and 13, and also general compatibility with SA Objective 7, given that the Town Centre is the most accessible location in the borough, and will support SA objectives towards economic growth and "town centre" development in existing centres. It is also likely to complement SA Objective 5, as some of these uses (e.g. restaurants and bars) could be accommodated in historic buildings and could help facilitate their repair and beneficial re-use. Introducing significantly more night-time entertainment into the Town Centre could impact on the amenity of existing communities living in and around the Town Centre and the occupiers of any new homes built. However, this would depend on where the facilities were located, and it is also likely that localised effects could be controlled effectively through the regulatory systems in place. The potential harmful effects are also offset by the benefits of locating such facilities in the Town Centre where they can be accessed by most people in the borough, hence the relationship between AAP Objective 5 and SA Objective 4 is considered "neutral" overall. As this option is not site-specific, there is uncertainty about compatibility with SA Objectives 1, 2, 9 and 14, and relationship to SA Objective 3 is considered neutral, for the same reasons indicated under AAP Objective 1. There is also uncertainty about the relationship to SA Objective 10, although encouraging more leisure uses is likely to increase the amount of food waste generated by businesses in the Town Centre.</p>
<p>AAP OBJECTIVE 6: Support businesses to increase employment opportunities, skills and aspirations through high quality jobs in a variety of sectors, supported by good links with education and training providers in the town centre.</p>	<p>As AAP Objective 6 relates to education, training and job creation, the land use implications are limited, and the relationship to most of the SA objectives is neutral. However, there is significant compatibility with SA Objective 7, as aspirations towards sustainable economic growth and retaining jobs in the borough can only be realised if there is a skilled and highly motivated local workforce in place. There is also compatibility with SA Objectives 4, 7, 8 and 13, as any training opportunities provided in the Town Centre would be accessible to large numbers of people in the borough, including people who do not have access to a car, and improving access to training is also likely to help lift people out of poverty and into employment, improving the well-being of those people.</p>
<p>AAP OBJECTIVE 7: Improve accessibility to and within the centre for all sectors of the community, through the provision of integrated transport and enhanced cycling and pedestrian links.</p>	<p>There is potential tension between AAP Objective 7 and SA Objectives 1 and 3, if the objective has the effect of increasing the number of trips by road into and within the Town Centre. The exceedance of statutory limit values for nitrogen dioxide (NO2) identified on the fringes of the Town Centre through air quality monitoring are largely caused by road transport, including buses which are the main form of public transport used in the borough. Road transport is also a significant cause of the carbon dioxide (CO2) emissions that contribute towards climate change. Such effects could be mitigated if the new infrastructure provided - including buses - is low-emission. As the objective specifically includes an aspiration to enhance cycling and pedestrian links as well as other transport links, the objective is highly compatible with SA Objective 13, as well as being compatible with SA Objectives 4, 7 and 8. However, for communities living in or near to the Town Centre, these benefits could be offset by localised effects of increased noise and emissions from buses. As this option is not site-specific, there is uncertainty about compatibility with SA Objectives 2, 5, 9 and 14, for the same reasons indicated under AAP Objective 1. There is also uncertainty about the relationship to SA Objective 10, although major improvements to transport infrastructure are likely to require significant amounts of raw materials for engineering.</p>
<p>AAP OBJECTIVE 8: Protect areas and buildings of historical importance while delivering high quality sustainable design that is well integrated and encourages greater activity in the town centre with innovative and high quality design and architecture at the core.</p>	<p>No definite areas of tension have been identified between AAP Objective 8 and the SA Objectives. It is particularly compatible with SA Objectives 5 and 9, and also compatible with SA Objectives 2, 4 and 8, because protecting the Town Centre's historic environment and delivering well-designed new developments in the Town Centre would also help improve the amenity and well-being of people who live there as well as those who work and visit the centre, and also provides opportunities to enhance biodiversity (e.g. improvements along the canals). The aspiration to deliver sustainable design is also compatible with SA Objectives 10, 11 and 14, as such developments would be energy and water efficient, include provision for sustainable waste management and for surface water management to reduce flood risk, and where feasible, would be generating at least some of their energy on-site from renewable and low carbon sources. There is some uncertainty about compatibility with SA Objective 13, as the aspiration to improve sustainable transport infrastructure could be harmful to the historic environment and townscape, depending on where the improvements take place and how impacts are managed. There is also uncertainty about compatibility with SA Objective 6, as aspirations to conserve and improve the built environment could increase the cost of development, which might in some cases make schemes unviable. On the other hand, an alternative objective which allowed badly-designed and unsustainable development is likely to create tensions with other SA objectives, and would also make the Town Centre less attractive for investors in the long-term.</p>
<p>AAP OBJECTIVE 9: Promote the sustainability of the centre by delivering environmental infrastructure and improvements that will deliver a range of benefits.</p>	<p>No definite areas of tension have been identified between AAP Objective 9 and the SA Objective, and indeed the relationship to most of the SA objectives is positive. It is particularly compatible with SA Objectives 2, 3, 5 and 9, as delivery of an integrated, multi-functional environmental infrastructure network will help conserve and enhance sites of importance for biodiversity, geodiversity, cultural heritage, townscape and open spaces and make it easier to manage them. It is also compatible with SA Objectives 4, 7 and 8, because such a network would help to improve access to open spaces, the natural environment and cultural heritage for people living in and around the Town Centre, and will help to improve their amenity and well-being and provide opportunities for active recreation. It would also provide opportunities to improve brownfield sites in line with SA Objective 12. There is some uncertainty about compatibility with SA Objective 13, as improvements to transport infrastructure could affect environmental assets, but on the other hand, an integrated environmental infrastructure network would also include "greenways" which would improve accessibility for cyclists and pedestrians. There is also uncertainty about compatibility with SA Objective 6, for the same reasons indicated under AAP Objective 8.</p>

<p>AAP OBJECTIVE 10: Transform the experience and perception of Walsall town centre for those who shop, work, visit, invest and live in Walsall through measures such as improved public realm, civic spaces, quality of place, pedestrian access and security alongside the active promotion of the centre and organisation of community events.</p>	<p>This objective is complementary with AAP Objectives 8 and 9 but is most compatible with SA Objective 9, as it is concerned with improving the quality of the built environment and townscape. It is also compatible with SA Objective 5 as conservation of the historic environment would also help improve the quality of the townscape. Like AAP Objective 8, there is compatibility with SA Objectives 2, 4 and 8, because the improvements aspired to would also enhance the amenity and well-being of people who live in, work in, and visit the Town Centre, and could also include opportunities to enhance biodiversity (e.g. improvements along the canals). There is some uncertainty about compatibility with SA Objective 13 for the same reasons indicated under AAP Objective 9, and about compatibility with SA Objective 6, for the same reasons indicated under AAP Objective 8. Relationship to SA Objectives 3 and 14 are also uncertain, as the creation of more pedestrianised areas could increase the amount of surface water run-off and could impact on flood risk.</p>
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Appendix D: SAD Options Appraisal Matrix

Note: Other options not considered “reasonable” are listed in Appendix F – these have not been appraised.

Options for the SAD – High Level Assessment														
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Walsall Site Allocations DPD (SAD) - Options														
Housing														
Housing Option 1 (Surplus Employment Land): Concentrate all new housing allocations on surplus former employment land (“category 4, 5 and 6” land, comprising sites that can be released, or sites that can be considered for release, as defined in the ELR).	+	+	+	+	0	0	+	+	0	0	+	+	+	?
Housing Option 2 (Non-Employment PDL and Surplus Open Space): Retain all existing employment land for employment uses, and allocate new housing on other previously developed land, including areas of surplus open space, instead.	+	?	+	?	0	0	+	?	-	0	+	+	+	?
Housing Option 3 (Greenfield Sites): Concentrate new housing development on greenfield sites, which would mainly involve sites in the Green Belt.	-	?	-	-	0	0	-	-	--	0	-	--	--	?
Land for Industry														
Land for Industry Option 1 (No Additional Land): Continue to try to find readily available land from the present supply and do not use land currently allocated for other purposes.	-	0	0	0	0	-	0	0	0	0	0	+	0	0
Land for Industry Option 2 (Additional Non-Employment PDL): As well as Option 1, expand the total readily available employment land supply by allocating extra brownfield land that is not currently allocated for employment purposes.	-	0	-	0	0	+	0	+	0	0	-	++	-	0
Land for Industry Option 3 (Additional PDL and Surplus Open Space): As well as options 1 & 2, expand the total readily available supply by allocating urban open space where there is no local deficiency and suitable for industry.	-	?	-	0	0	+	0	+	0	0	-	0	-	?
Land for Industry Option 4 (Additional PDL, Surplus Open Space and Greenfield Sites): As well as options 1,2,& 3, expand the total employment land supply by bringing in extra land, including Green Belt/greenfield as well as other brownfield land, if necessary.	-	?	-	0	0	?	-	?	--	-	-	--	--	?

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Shopping and Services														
Local Centres														
Local Centres Option 1 (No Change to UDP Policy): Do not review the Local Centres. This would mean keeping the current development opportunities identified in the UDP and addressing issues of local need on an individual basis.	0	0	0	-	0	-	0	0	0	0	0	0	0	0
Local Centres Option 2 (Review to Reflect New Housing Proposals): Review Local Centres as a result of new housing locations in order to ensure they are of the appropriate scale and form to meet their catchments needs.	+	0	0	+	0	+	+	+	?	0	0	0	0	0
Out-of-Centre Developments														
Out-of-Centre Developments Option 1 (No Change to Existing Sites): Allow out-of-centre development to remain as it is and deal with any proposed change of use on an individual proposal basis.	-	0	-	-	0	-	-	-	0	0	0	0	-	0
Out-of-Centre Developments Option 2 (Allocate Declining Sites for Other Uses): Reallocate developments to be transferred to industry or housing.	+	0	0	+	0	+	+	+	+	0	+	0	+	0
Open Space, Leisure and Community Facilities														
Open Space														
Open Space Option 1 (Increase Provision in Areas of Deficiency): Allocate extra open space sites in areas of the Borough that currently have deficiencies in provision.	+	+	+	+	0	0	++	++	+	0	0	0	0	+
Open Space Option 2 (Safeguard Existing Sites Only): Maintain the current level of open space sites proposed for allocation as shown in Map 6.1 and Appendix 6a (see main SAD Issues & Options Report).	0	0	0	+	0	0	0	+	+	0	0	0	0	+
Open Space Option 3 (Re-Allocate certain Open Space for Other Uses): Remove open space allocations on some sites that have limited value for open space or where there are not sufficient resources available to maintain the site for the open space functions (see Chapter 6 of main SAD Issues & Options Report).	0	?	0	?	0	0	0	?	-	0	0	0	0	0
Community and Leisure Facilities														
Community and Leisure Facilities Option 1 (No Site Allocations): The SAD does not allocate land for community and leisure facilities and deals with applications for such uses on an individual basis in accordance with the relevant planning policy.	0	0	0	?	0	0	?	0	0	0	0	0	0	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Community and Leisure Facilities Option 2 (Allocate Sites for Planned New Facilities): The SAD allocates sites for community and leisure facilities where evidence has been submitted by a provider or community group to support a local need in that area that can be delivered.	0	0	0	+	0	0	+	+	0	0	0	0	?	0
Environmental Network														
Environmental Network Option 1 (Enhancement Where Opportunities Arise): The expansion and enhancement of natural and built environmental infrastructure (linking designated nature sites with other open space sites, watercourses and features of the historic environment) should take place wherever opportunities arise.	0	+	+	0	+	0	0	+	+	0	0	0	0	+
Environmental Network Option 2 (Target Areas of Deficiency): The expansion and enhancement of natural and built environmental infrastructure should be targeted at areas of natural green space deprivation or places where the network is deficient.	0	++	+	+	++	0	+	+	++	0	0	0	0	++
Waste Management														
Waste Recovery Targets														
Waste Recovery Targets Option 1a (General Recovery Targets): The SAD would set general waste management targets for delivery of new municipal waste recovery capacity for paper, card, cans, glass, plastics, food waste, and/ or green garden waste, which could be met through delivery of any recycling, composting or energy recovery facilities.	0	0	0	0	0	+	0	0	0	+	0	0	0	0
Waste Recovery Targets Option 1b (Waste Recycling Targets): The waste management targets in the SAD would be based on delivery of new municipal waste recycling and composting capacity only, for the same waste types as Option 1a. Such a target would help Walsall to meet the Waste Framework Directive for re-use and recycling of municipal waste.	0	0	0	0	0	+	0	0	0	++	0	0	0	0
Waste Recovery Targets Option 1c (Additional Target for CD&EW Recycling): This would be in addition to Option 1a or 1b. Such a target could be included if additional CD&EW capacity is needed to meet the Waste Framework Directive target for re-use and recycling of non-hazardous construction and demolition waste.	0	0	0	?	0	+	?	0	0	++	0	0	0	0
Waste Infrastructure														
Waste Infrastructure Option 2a (Prioritise Safeguarding of Strategic Sites): This would involve showing the boundaries of Strategic Sites on the Policies Map for Walsall, but not other waste sites. There would be a linked site allocation policy in the SAD explaining how BCCS Policy WM2 will be applied.	0	0	0	0	0	+	0	0	0	+	0	0	0	0
Waste Infrastructure Option 2b (Safeguard All Existing Waste Sites): As well as Strategic Sites (site boundaries), the location of non-strategic sites would be shown on the Policies Map for Walsall (symbols only). There would be a linked site allocation policy in the SAD explaining how BCCS Policy WM2 will be applied.	0	0	0	0	0	+	0	0	0	++	0	0	0	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Suitable Waste Management Locations														
Suitable Waste Management Locations Option 3a (Rely on BCCS Policies and SAD Allocations and Designations): The SAD Policies Map will define the areas of Existing and Potential High Quality and Local Quality industrial land to which BCCS Policies EMP2, EMP3 and WM4 apply. The Policies Map will also define “Consider for Release” industrial sites, areas of Urban Open Space, and the extent of the Green Belt where open air operations could go. However, there will be no locally-specific guidance on where different types of waste facilities could be located within the borough.	0	0	0	0	0	+	0	0	?	+	0	0	0	0
Suitable Waste Management Locations Option 3b (SAD to Provide Additional Guidance): As well as defining the areas of Existing and Potential High Quality, Local Quality and “Consider for Release” industrial sites, areas of Urban Open Space, and the extent of the Green Belt on the Policies Map for Walsall, the SAD will provide guidance on the types of waste facilities considered suitable on these types of site allocations/designations. The SAD will also identify specific locations in Walsall which would be suitable for particular types of facility.	0	0	0	0	0	+	0	0	0	++	0	0	0	0
Minerals														
Mineral Safeguarding Area (MSA)														
Mineral Safeguarding Area Option 1a (Single MSA): One MSA, including all minerals of local and national importance to be shown on the Policies Map, with an Appendix to the SAD containing supplementary maps showing the extent of different mineral types. The red hatched line on Map M1 indicates the area that would be covered by a single MSA.	0	0	0	0	0	+	0	0	+	++	0	+	0	0
Mineral Safeguarding Area Option 1b (Multiple MSAs): Separate MSAs, one covering each mineral type, to be shown on the Policies Map. The individual coloured areas on Map M1 indicate what separate MSAs might look like.	0	0	0	0	0	+	0	0	+	++	0	+	0	0
Mineral Safeguarding Area Option 1c (MSA Buffers): As Option 1a or 1b, but the MSA(s) would also include “buffers” around the resource areas, as shown on Maps MC1 – MC3 in BCCS Appendix 7. There would be a 50m buffer zone around brick clay (Etruria marl) resources, a 250m buffer zone around sand and gravel and fireclay and coal resources and a 500m buffer zone around limestone and dolerite resources.	0	0	0	0	0	+	0	0	+	++	0	+	0	0
Mineral Supply Requirements - Brick Clay (Etruria Marl)														
Brick Clay (Etruria Marl) Supply Option 3a (Stubbers Green Area of Search Only): The SAD will only include one Area of Search for brick clay (Etruria marl) at Stubbers Green, as indicated in the BCCS. The boundary of the proposed Area of Search is shown as a black dashed outline on Map 9.2 and on Minerals Inset Map 2 (MXA3).	0	-	0	0	0	+	0	0	-	+	0	-	0	?

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Brick Clay (Etruria Marl) Supply Option 3b (Additional Area of Search North of A461): As well as the Area of Search at Stubbers Green (MXA3), the SAD would include another potential working area/ Area of Search for brick clay (Etruria marl), to the north of the A461. Minerals Inset Map 2 shows the extent of the resource area for brick clay in this area, which could be included.	0	--	0	-	0	+	0	0	-	+	0	-	-	?
Mineral Supply Requirements - Fireclay														
Fireclay Supply Option 4a (Wyrley Estates Option): The SAD will include an Area of Search for fireclay at Yorks Bridge, as indicated in the BCCS. Under this option, the boundary of the Area of Search would be based on that put forward by Wyrley Estates during consultation on the BCCS. This is shown as a blue dashed outline on Map 9.2 and on Minerals Inset Map 3 (MXA4 (a)).	0	--	0	-	0	+	0	0	-	+	0	-	-	0
Fireclay Supply Option 4b (Potters Clay & Coal Company Option): The SAD will include an Area of Search for fireclay at Yorks Bridge, as indicated in the BCCS. Under this option, the boundary of the Area of Search would be based on that put forward by Potters Clay & Coal Company Ltd at the BCCS Examination. This is shown as a green dashed outline on Map 9.2 and on Minerals Inset Map 3 (MXA4 (b)).	0	--	0	-	0	+	0	0	-	+	0	-	-	0
Fireclay Supply Option 4c (Include Brownhills Common and Land at Yorks Bridge): The SAD will include an Area of Search for fireclay at Yorks Bridge, as indicated in the BCCS. Under this option, the boundary of the Area of Search would be based on a combination of Minerals Option 3a and Minerals Option 3b, and would also be extended to include the "dormant" site at Brownhills Common (MP5) and the Potential New Mineral Extraction Site/ "Choices Site" at Yorks Bridge (Mineral Site MXP4, Choices Site CH93). This is shown as a red dashed outline on Map 9.2 and on Minerals Inset Map 3 (MXA4 (c)).	0	--	0	--	0	+	0	0	--	+	0	-	-	0
Mineral Supply Requirements - Site Allocations														
Mineral Site Allocations Option 5a (Allocate Sites for Mineral Extraction): The SAD would allocate specific sites for mineral extraction where, following evaluation, there is evidence that an acceptable scheme can be brought forward within the plan period. The four Potential New Mineral Extraction Sites that the Council has identified are listed in Table M5 and are shown on Map 9.2, on Minerals Inset Maps 1 – 3, and on the Ward Maps (MXP1 – MXP4).	0	-	0	-	0	+	0	0	-	++	0	-	-	?
Mineral Site Allocations Option 5a (No Site Allocations): The SAD would not include any specific site allocation policies for mineral extraction, and would rely on the Areas of Search to indicate where mineral extraction could take place within the plan period. The proposed boundaries of the Areas of Search at Aldridge, Branton Hill and Stubbers Green (MXA1 – MXA3) and alternative options for the Area of Search at Yorks Bridge (MXA4), are shown on Map 9.2, on Minerals Inset Maps 1 – 3 and on the Ward Maps.	0	-	0	-	0	0	0	0	-	+	0	-	-	?

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Limiting the Impacts of Mineral Extraction														
Limiting the Impacts of Mineral Extraction Option 6a (Phasing Policy): The SAD would aim to control the cumulative effects of mineral extraction on the local environment, businesses, communities, and infrastructure, through a phasing policy. This would prevent new extraction schemes in areas already significantly affected until certain conditions are met or "triggers" reached.	0	+	0	+	0	0	0	+	+	+	+	+	+	?
Limiting the Impacts of Mineral Extraction Option 6b (No Phasing Policy): The SAD would not include any phasing policy but would rely on BCCS Policy MIN5 and national policy guidance to control the cumulative effects of mineral extraction.	0	0	0	-	0	0	0	0	0	0	0	-	-	?
Land for Transport														
Transport Option 1 (Safeguard Land): Safeguard the Walsall – Brownhills rail formation and land for the DSDA Access project, and land for park and ride to serve Aldridge.	+	0	+	+	-	+	+	0	0	+	+	0	++	0
Transport Option 2 (Do Not Safeguard Land): Do not safeguard any land for transport purposes.	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Utilities Infrastructure														
Utilities Infrastructure Option 1 (Allocate Sites for Renewable Energy): Allocate land for large-scale renewable energy (wind and biomass) generation projects.	?	?	++	?	0	+	0	0	?	?	++	?	+	0
Utilities Infrastructure Option 2 (Do Not Allocate Sites for Renewable Energy): Do not allocate land for renewable energy generation but address policy requirements through individual development proposals.	?	0	0	0	0	0	0	0	?	0	0	0	0	0

Key to the High Level Assessment Matrix	
Likely strong positive effect	++
Likely positive effect	+
Neutral/ no effect	0
Likely adverse effect	-
Likely strong adverse effect	--
Uncertain effects	?

Appendix E: AAP Options Appraisal Matrix

Note: Other options not considered “reasonable” are listed in Appendix G – these have not been appraised.

Options for the AAP – High Level Assessment														
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Walsall Town Centre AAP - Options														
What is Walsall Town Centre?														
Town Centre Boundary														
Town Centre Boundary Option 1 (UDP Boundary): Retain the current extent of the Town Centre Boundary (as defined in Walsall UDP 2005).	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Town Centre Boundary Option 2 (Expanded Boundary): Increase the current extent of the Town Centre Boundary.	0	0	0	0	0	0	0	0	0	0	0	0	?	?
Town Centre Boundary Option 3 (Contracted Boundary): Decrease the current extent of the Town Centre Boundary.	0	0	0	?	--	?	0	0	--	0	0	+	?	?
A Place for Shopping														
Primary Shopping Area (PSA) Boundary														
PSA Option 1 (UDP Boundary): Retain the current PSA boundary (i.e. as defined on Walsall UDP Town Centre Inset Map).	0	0	0	0	0	0	0	0	0	0	0	0	0	0
PSA Option 2 (Expanded Boundary): Expand the current PSA boundary.	0	0	0	0	-	?	0	0	?	0	0	-	?	0
PSA Option 3 (Contracted Boundary): Reduce the current PSA boundary.	0	0	0	0	?	-	0	0	-	0	0	+	?	0
PSA Option 4 (Phased Expanded Boundary): Expand the PSA once all development opportunities within the current Primary Shopping Area have been maximised.	0	0	0	0	?	?	0	0	?	0	0	?	?	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Location of Major Retail Development														
Location of New Retail Option 1 (Park Street & St. Matthew's Quarter Only): Park Street (as defined in Figure 4.2 of main AAP document) and St Matthew's Quarter are allocated for retail development opportunities.	0	0	0	+	+	+	+	0	+	0	0	+	+	0
Location of New Retail Option 2 (Park Street & St. Matthew's Quarter Then Other Locations): Once opportunities have been maximised for Park Street and St Matthew's Quarter, development opportunities elsewhere in the Town Centre will be allocated for retail development.	0	0	0	0	0	+	+	0	+	0	0	+	+	0
Location of New Retail Option 3 (Market-Led - No Opportunities Identified in AAP): The location of major retail development is uncontrolled through the AAP and the location of key retail is left to the market.	-	0	0	?	?	?	?	0	?	0	0	?	?	0
Walsall Market														
Walsall Market Option 1 (The Bridge/ Bradford Street): Pursue the proposed permanent location for the market on The Bridge and in Bradford Street.	0	0	0	0	0	0	0	0	0	0	0	0	+	0
Walsall Market Option 2 (Other Indoor/ Outdoor Locations): The Council reconsiders other potential indoor and outdoor locations for the market.	0	0	0	0	?	?	?	0	?	0	?	?	?	0
A Place for Business														
Location of Major New Office Development														
Location of New Offices Option 1 (Gigaport): The Gigaport remains the prime location for office development in Walsall Town Centre.	-	0	0	0	0	+	0	0	?	0	0	+	-	0
Location of New Offices Option 2 (Dispersed Locations): Offices are dispersed around the centre.	0	0	0	0	0	+	0	0	?	0	0	+	+	0
Industrial Uses														
Industrial Uses Option 1 (Safeguard Existing Industrial Areas): The AAP protects and enhances the current industrial uses within the Town Centre boundary.	?	0	?	-	?	?	0	?	?	0	-	-	0	0
Industrial Uses Option 2 (Allow Incremental Change to Other Uses): Alternative uses for the current industrial sites and the relocation of industry are considered once all other development opportunities have been maximised (as in accordance with BCCS Policies).	+	0	0	+	0	+	0	0	0	0	+	+	0	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Industrial Uses Option 3 (Target Specific Industrial Sectors): The AAP aims to attract particular industrial sectors, for example those that would utilise the close location to the hospital could be allocated sites for the promotion of Research and Development or other related uses.	0	0	0	0	0	+	0	+	0	0	0	+	0	0
A Place for Leisure														
Leisure Facilities														
Leisure Facilities Option 1 (No Change to Gala Baths): The Council does not invest in the Gala Baths.	0	0	0	-	-	-	-	-	-	0	0	0	0	0
Leisure Facilities Option 2 (Retain and Invest in Gala Baths): The Council invests in the Gala Baths in its current location.	0	0	0	+	+	+	+	+	+	0	0	0	+	0
Leisure Facilities Option 3 (Close Gala Baths and Invest in Other Facilities): The Council invests in leisure facilities elsewhere in the Town Centre.	0	0	0	?	?	?	?	?	?	0	0	?	-	0
Leisure Facilities Option 4 (Replace Gala Baths with New Leisure Centre): The Council seeks partner and/or private sector investment to deliver leisure facilities in the Town Centre.	0	0	0	?	?	?	?	?	?	0	0	0	?	0
Leisure Facilities Option 5 (No Leisure Facilities in Town Centre): The Council does not provide any leisure facilities in the Town Centre.	0	0	0	-	?	--	--	--	?	0	0	0	-	0
Cultural and Community Facilities - Museums and Local History Centre														
Cultural and Community Facilities Option 1 (Allocate Leather Museum Site): The Leather Museum site is allocated as a potential location for a combined museum and local history centre.	+	0	0	+	+	+	+	+	?	0	0	0	+	0
Cultural and Community Facilities Option 2 (Do Not Allocate Any Site): The AAP does not allocate a specific site for a combined museum and local history centre.	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cultural and Community Facilities - Performance Venues														
Cultural and Community Facilities Option 3 (New Large Performance Venue): The AAP allocates land for a large performance venue.	0	0	0	?	?	+	+	+	?	0	0	+	+	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Cultural and Community Facilities Option 4 (Promote Existing Performance Venues): The AAP identifies, promotes and protects existing venues (Walsall Town Hall, New Art Gallery, Walsall College).	0	0	0	+	+	+	+	+	+	0	0	0	+	0
Cultural and Community Facilities Option 5 (No Provision for Performance Venues): The AAP leaves the location of cultural and community facilities to the market.	-	0	0	?	?	?	?	?	?	0	0	?	?	0
Cultural and Community Facilities Option 6 (Provide Performance Venues in Mixed Use Schemes): The AAP allocates locations for mixed use leisure opportunities which include performance space.	+	0	0	+	+	+	+	+	+	0	0	+	+	0
Cultural and Community Facilities - Outdoor Events														
Cultural and Community Facilities Option 7 (Identify Spaces for Outdoor Events): The AAP allocates space(s) for outside performances and events that is to be protected, enhanced and promoted through the redevelopment of the Town Centre.	0	0	0	+	+	+	+	+	+	0	0	+	+	0
Cultural and Community Facilities Option 8 (No Provision for Outdoor Events): The AAP does not allocate or set any policies for the promotion of outdoor performances or events.	0	0	0	-	-	-	-	-	-	0	0	0	0	0
Evening Economy														
Evening Economy Option 1 (Zones Identified for Investment): The AAP identifies particular zones within the Town Centre in which to focus investment in the evening economy.	0	0	0	?	?	?	?	?	?	0	0	0	+	0
Evening Economy Option 2 (Dispersed Development): The location of evening economy establishments is not zoned.	0	0	0	?	?	?	?	?	?	0	0	0	?	0
Overnight Accommodation														
Overnight Accommodation Option 1 (Zones Identified for Investment): The AAP identifies particular zones within the Town Centre in which to focus investment in overnight accommodation.	0	0	0	+	+	+	+	0	0	0	0	0	0	0
Overnight Accommodation Option 2 (Dispersed Development): The location of overnight accommodation is not zoned but is dispersed around the Town Centre to support different elements of the Town Centre offer.	0	0	0	+	+	+	0	0	0	0	0	0	?	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Walsall Canal Arm, Towpaths and Basin														
Canal Option 1 (Development Required to Enhance Canalside Environment): The AAP sets higher standards of design for development along the Canal and requires development fronting the Canal to financially contribute towards the enhancement of the canal network.	0	+	?	+	+	?	0	+	+	0	?	?	+	+
Canal Option 2 (Development Not Required to Enhance Canalside Environment): No specific requirements are set for development fronting the Canal within the Town Centre.	0	?	?	?	?	?	0	?	?	0	?	?	?	?
Location of New Leisure Development														
Location of Leisure Option 1 (Waterfront Only): The AAP allocates Waterfront as the primary location for large scale leisure developments.	?	?	0	0	?	+	0	0	?	0	0	+	+	?
Location of Leisure Option 2 (Waterfront Then Other Locations): Leisure development is allocated elsewhere in the Town Centre only when Waterfront is fully delivered for leisure or other uses.	?	0	0	0	?	+	0	0	?	0	0	0	+	0
Location of Leisure Option 3 (No Leisure Locations Identified): Leisure development is not allocated and the location of such development is left to the market.	-	0	0	?	?	?	?	?	?	0	0	?	?	0
A Place for Living														
Level and Location of Housing Development														
Housing Option 1 (New Housing Allocations): The AAP allocates further sites for housing development.	?	0	0	++	+	-	?	?	0	0	0	0	++	?
Housing Option 2 (Provide Housing through Mixed Use Schemes Only): No further land is allocated for housing development, but the use is included as an option for mixed use developments where suitable.	?	0	0	+	+	+	?	?	0	0	0	0	+	0
Housing Option 3 (Providing Housing through LOTS & Other Vacant Floorspace): The AAP encourages the use of flats over shops ("living over the shop" - LOTS) or other vacant floorspace for housing.	?	0	0	+	+	+	?	?	+	0	0	0	+	0
Housing Option 4 (No New Housing Provision): No further land is allocated through the AAP for housing development.	0	0	0	?	?	?	?	?	-	0	0	0	0	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Residential Environments														
Residential Environments Option 1 (Minimum Standards for Residential Environments): The AAP sets out requirements for satisfactory residential environments recognising the benefits and possible restrictions of housing within centres.	0	0	0	++	+	?	+	+	++	0	0	0	0	0
Residential Environments Option 2 (No Specific Requirements): No specific additional requirements are set for residential environments in the Town Centre.	0	0	0	?	?	0	?	?	?	0	0	0	0	0
Education and Health														
Education and Health Option 1 (Allocate Land for Expansion of Existing Education and Health Facilities): The AAP allocates land to deliver the future expansion requirements of the Hospital, other health providers, and the College.	?	0	0	+	?	?	+	++	?	0	0	0	++	?
Education and Health Option 2 (No Provision for Education and Health): The AAP does not allocate land for the future expansion requirements of the Hospital, other health providers, and the College.	0	0	0	?	0	?	?	?	0	0	0	0	0	0
The Character of Walsall Town Centre														
Character Option 1 (Protect Buildings Important to Local Character): The AAP identifies buildings that enhance the character of Walsall Town Centre and protects them.	0	0	0	+	++	?	0	0	++	0	0	0	0	0
Character Option 2 (Encourage Development in Places of Character): The AAP identifies buildings and places that are positive to the character of Walsall Town Centre and seeks to ensure they contribute to future development.	0	0	0	+	?	+	0	0	?	0	0	0	0	0
Character Option 3 (Consolidate and Enhance Identified Character Zones): The AAP seeks to consolidate and enhance the four identified character zones (as shown on Figure 7.4 of AAP document).	0	0	0	+	++	?	0	0	++	0	0	0	0	0
Conservation Areas and Listed Buildings														
Conservation Option 1 (Review Conservation Area Boundaries): Review Conservation Area boundaries.	0	0	0	0	?	?	0	0	?	0	0	0	0	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Conservation Option 2 (Address Specific Problems Affecting Conservation Areas): Prepare policies that address specific aspects of decline in conservation areas, such as poor advertisement, poor shop fronts or low quality materials.	0	0	0	0	+	?	0	0	+	0	0	0	0	0
Conservation Option 3 (Grading of Locally Listed Buildings): Introduce grading for locally listed buildings.	0	0	0	0	+	0	0	0	+	0	0	0	0	0
Conservation Option 4 (Improve Interpretation of Historic Environment): Prepare a policy to facilitate learning and interpretation of the historic environment around the Town Centre.	0	0	0	0	+	0	+	0	+	0	0	0	0	0
Conservation Option 5 (Rely on Existing Policy and Legislation): Continue to manage the historic environment under the current legislation.	0	0	0	0	?	?	0	0	?	0	0	0	0	0
Protected Views														
Protected Views Option 1 (Protect Locally Important Views): Policies are set for protecting views through the management of new development within or bordering the sight line.	0	0	0	0	+	?	0	0	+	0	0	0	0	0
Protected Views Option 2 (No Provision to Protect Views): The AAP does not seek to protect views within the Town Centre.	0	0	0	0	?	0	0	0	?	0	0	0	0	0
The Design of New Buildings														
Design Option 1 (Rely on Existing Design Policy): The AAP sets no design requirements above what is already needed to meet current planning policy.	0	0	?	0	?	?	0	0	?	0	0	0	0	?
Design Option 2 (Design Codes for the Town Centre): Design codes are set for the Town Centre requiring high quality design, setting out what level is expected and identifying key locations for exemplar buildings.	0	0	+	+	+	?	0	0	+	0	0	0	0	?
Design Option 3 (Design Standards for Buildings in Key Locations): The AAP seeks exemplar design standards for new buildings in prominent locations to set a precedent for the Town Centre.	0	0	+	+	++	?	0	0	++	0	0	0	0	?
Design Option 4 (Apply BCCS Renewable Energy Requirements Only): The AAP sets no renewable energy requirements above what is already needed to meet current planning policy (i.e. BCCS Policy ENV7).	0	0	-	0	0	0	0	0	0	0	0	0	0	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Design Option 5 (Additional On-Site Renewable Energy Requirements for Town Centre Developments): Requirements for on-site renewable energy generation are set where appropriate from Town Centre developments that go beyond the BCCS requirements.	+	0	+	0	?	?	0	+	?	0	+	0	0	0
Design Option 6 (Allocate Sites for New Renewable Energy Generating Infrastructure): The AAP actively allocates land for large scale renewable energy projects such as a combined heat and power facility.	?	0	++	0	?	?	0	+	?	+	+	?	0	0
Public Realm														
Public Realm Option 1 (Identify Priority Areas for Improvement): The AAP allocates areas to prioritise for public realm improvements.	0	0	0	+	+	?	+	+	+	0	0	0	+	0
Public Realm Option 2 (Identify Sites for New Public Spaces): Sites are allocated for new proposed public realm.	0	0	0	+	?	?	+	+	?	0	0	?	+	0
Public Realm Option 3 (No Area-Specific Guidance): The AAP recognises the importance of public realm but does not identify specific areas for improvement.	0	0	0	?	?	?	0	?	?	0	0	0	0	0
Linkages														
Linkages Option 1 (De-Cluttering of Park Street): Improvements to Park Street continue to make it more legible by the removal of planting beds, seats, lights, and signs and enhancement of the paving.	0	0	0	+	+	0	?	?	+	0	0	0	?	0
Linkages Option 2 (No Alterations to Park Street): Park Street's character is maintained but with no further alternations to its appearance and character.	0	0	0	0	0	0	0	0	0	0	0	0	?	0
Linkages Option 3 (Improve Accessibility Through Redevelopment of Poundland Site): The building currently occupied by Poundland is identified to be demolished if improvements to the public transport network are delivered.	0	0	0	?	?	?	+	0	+	0	0	0	+	0
Linkages Option 4 (Other Methods of Improving Linkages): The AAP identifies other ways in which linkages can be improved between Park Street and the rest of the Town Centre.	0	0	0	+	0	0	+	0	0	0	0	0	+	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Environmental Infrastructure														
Environmental Option 1 (Identify Assets Requiring Improvement): The AAP highlights the existing key environmental assets where improvements will be sought.	+	+	+	+	+	?	0	+	+	0	0	+	+	+
Environmental Option 2 (Rely on Existing Policy to Deliver Environmental Improvements): The AAP sets out no specific assets for improvement or mechanisms to deliver the improvements.	?	?	?	?	?	0	0	?	?	0	0	?	?	?
Transport, Movement and Accessibility														
Pedestrianisation														
Pedestrianisation Option 1 (Area Between Crown Wharf and Park Street): The area between Crown Wharf Retail Park and Park Street is pedestrianised to encourage movement between the Town Centre and the retail park.	?	0	0	+	?	+	+	+	?	0	0	0	?	0
Pedestrianisation Option 2 (Partial De-Pedestrianisation to Allow Bus Access to The Bridge/ Park Street): Through partial de-pedestrianisation buses could be allowed into the Bridge and/or Park Street areas to allow greater penetration into the Town Centre and easier links between public transport modes and services.	?	0	0	0	-	?	?	?	?	0	0	0	?	0
Pedestrianisation Option 3 (No Change to Existing Pedestrianised Areas): No further areas of pedestrianisation are identified through the AAP.	?	0	0	0	0	?	?	?	0	0	0	0	?	0
Public Transport														
Public Transport Option 1 (Expansion of St. Paul's Bus Station): Re-develop St. Paul's into a bus station with larger capacity.	?	0	?	?	-	?	?	?	-	0	0	0	?	0
Public Transport Option 2 (New Multi-Modal Interchange Facility): Development of a new multi-modal facility at Station Street.	?	0	?	?	?	?	+	?	?	0	0	0	+	0
Public Transport Option 3 (Expansion of Bradford Place): Redevelop Bradford Place Interchange to create larger capacity by expanding into Jerome Retail Park.	+	0	?	?	+	?	?	?	+	0	0	0	+	0
Public Transport Option 4 (No Change to Public Transport Infrastructure): No major public transport changes are identified through the AAP.	?	0	?	?	0	?	?	?	0	0	0	0	?	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Walsall Rail Station														
Walsall Rail Station Option 1 (Expand Walsall Railway Station): The AAP proposes the redesign and expansion of the railway station to create greater capacity.	0	0	0	?	0	?	?	?	0	0	0	0	+	0
Walsall Rail Station Option 2 (No Change to Walsall Railway Station): The AAP promotes the railway station as a transport hub but does not seek to enhance its capacity.	0	0	0	0	0	?	0	0	0	0	0	0	?	0
Taxis														
Taxis Option 1 (Additional Taxi Ranks): The AAP identifies the locations for additional taxi ranks.	?	0	0	0	0	+	+	0	0	0	0	0	+	0
Taxis Option 2 (No Additional Taxi Ranks): The AAP does not identify additional locations for taxi ranks.	0	0	0	?	0	?	?	?	0	0	0	0	0	0
Taxis Option 3 (Review Location of Taxi Ranks): The AAP reviews the location of all taxi ranks.	?	0	0	+	0	+	+	+	0	0	0	0	+	0
Coach Facilities														
Coach Facilities Option 1 (Identify Locations for Coach Stopping Facilities): The AAP identifies the locations for coach stopping facilities.	?	0	0	0	?	+	+	0	?	0	0	0	+	0
Coach Facilities Option 2 (No Provision for Coach Stopping Facilities): No coach stopping facilities are identified through the AAP.	0	0	0	0	0	?	0	0	0	0	0	0	?	0
Road Network														
Road Network Option 1 (Air Quality Standards for Buses): The AAP sets more stringent air quality standards for buses operating within the Town Centre.	+	0	+	0	0	?	?	+	0	0	+	0	?	0
Road Network Option 2 (Introduce Measures to Encourage Low Emission Vehicles): The Council works with businesses (such as retailers) and bus operators to encourage the take up of cleaner, low carbon and low emission vehicles to minimise the adverse impacts of vehicles on emissions.	+	0	+	0	0	?	?	+	0	0	+	0	?	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Road Network Option 3 (No Action to Reduce Vehicle Emissions): The AAP recognises the issues around the air quality but sets no standards or process by which to reduce emissions within the Town Centre.	-	0	-	0	0	0	0	-	0	0	-	0	-	0
Car Parking														
Car Parking Option 1 (Allocate Land for New "Super" Car Parks): The AAP allocates land for 'super' car parks in locations that serve the Town Centre and take into account the proposed redevelopment.	?	0	?	0	?	+	?	0	?	0	0	0	+	0
Car Parking Option 2 (Rationalise Current Car Park Provision): The AAP sets out an approach to rationalising current car park provision without providing for 'super' car parks.	?	0	?	0	?	?	?	0	0	0	0	0	?	0
Car Parking Option 3 (No Strategic Approach Towards Town Centre Car Parking): No strategic approach is identified for the location of car parks within the Town Centre.	?	0	?	0	0	-	0	0	0	0	0	0	-	0
Car Parking Option 4 (Standards for Off-Street Car Parking Charges): The AAP sets a consistent approach to parking charges for all off-street parking provision in the Town Centre.	0	0	0	0	0	?	0	0	0	0	0	0	?	0
Car Parking Option 5 (No Standard Approach for Off-Street Car Parking Charges): The AAP sets no standard approach to off-street car parking charges.	0	0	0	0	0	?	0	0	0	0	0	0	?	0
A Place for Investment														
The Approach														
Investment Option 1 ("Big Three" and Park Street Identified as Development Opportunities): The AAP promotes the Big Three and Park Street as the key development opportunities as the overall approach to regenerating the Town Centre.	0	0	0	+	?	++	0	0	?	0	0	++	++	0
Investment Option 2 (Vision and Land Use Policies for "Big Three" and Park Street): The AAP sets out clearly the vision for the Big Three and Park Street along with the type of uses to be promoted within these developments.	0	0	0	+	?	?	0	0	?	0	0	?	++	0
Investment Option 3 (No Specific Guidance for "Big Three" and Park Street): The AAP is flexible about uses and the vision for the Big Three and Park Street allowing the market to lead.	0	0	0	?	?	++	?	0	?	0	0	?	?	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Investment Option 4 (Environmental Standards for New Development within "Big Three"): The AAP sets exemplar environmental standards for the Big Three in order to drive the town centre forward.	+	+	++	0	0	?	0	+	?	++	++	0	0	++
Investment Option 5 (Design Standards for New Development within "Big Three"): The AAP sets exemplar design for the Big Three in order to drive the Town Centre forward.	0	0	0	+	+	?	0	0	++	0	0	0	0	0
St Matthew's Quarter - Old Square														
Old Square Option 1 (No Land Use Change): The AAP identifies Old Square Shopping Centre to remain primarily a retail location.	0	0	0	+	+	++	+	0	+	0	0	++	++	0
Old Square Option 2 (Expand/ Redevelop with Larger Retail Units): The AAP identifies the Old Square Shopping Centre as an opportunity to be expanded/ redeveloped to provide larger units.	0	0	0	+	?	++	+	0	?	0	0	0	++	0
Old Square Option 3 (Identify as Mixed Use Development Opportunity): The AAP promotes Old Square Shopping Centre as a development opportunity for a variety of Town Centre uses.	0	0	0	0	0	?	0	0	?	0	0	0	++	0
St Matthew's Quarter - Shannon's Mill														
Shannon's Mill Option 1 (No Land Use Change to Front Site): The AAP identifies Shannon's Mill front site to remain primarily a retail location.	0	0	0	0	?	++	0	0	?	0	0	0	+	0
Shannon's Mill Option 2 (Identify Rear Site as Mixed Use Development Opportunity): The AAP promotes the Shannon's Mill rear site as a development opportunity for any appropriate Town Centre uses.	0	0	0	0	?	+	0	0	?	0	0	0	+	0
Gigaport														
Gigaport Option 1 (Identify as Walsall's Main Business/ Office Development Location): The Gigaport is allocated and promoted through the AAP as Walsall's business district with the development of large office accommodation and associated uses.	?	0	0	+	?	++	0	0	?	0	0	+	?	?
Gigaport Option 2 (Identify for Other Town Centre Uses): The Gigaport is allocated for other appropriate town centre uses and business needs are allocated elsewhere in the Town Centre.	?	0	0	+	?	?	0	0	?	0	0	+	?	?

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Gigaport Option 3 (Identify Land Adjacent to Littleton Street as Phase One): The sites located adjacent to Littleton Street should be promoted as the first phase of sites delivered in Gigaport.	?	0	0	+	?	+	0	0	?	0	0	+	+	?
Waterfront - Waterfront North														
Waterfront North Option 1 (Allocate for Leisure Uses): Waterfront North is allocated through the AAP for leisure facilities, for example cinema and conferencing facilities.	0	0	0	+	?	++	+	0	?	0	0	+	++	0
Waterfront North Option 2 (Allocate for Any Town Centre Uses): Waterfront North is allocated for any appropriate Town Centre use.	0	0	0	+	?	+	+	0	?	0	0	+	+	0
Waterfront - Waterfront Lex														
Waterfront Lex Option 1 (Allocate for Leisure Uses): Waterfront Lex is allocated through the AAP for leisure facilities, for example conferencing/ banqueting facilities.	?	0	0	+	?	++	+	0	?	0	0	+	+	?
Waterfront Lex Option 2 (Allocate for Housing): Waterfront Lex is allocated through the AAP for residential use.	?	0	0	+	?	?	?	0	?	0	0	+	+	?
Waterfront Lex Option 3 (Allocate for Any Town Centre Uses/ Mixed Uses): Waterfront Lex is allocated for any appropriate town centre use, or a mixed use proposal.	?	0	0	+	?	+	0	?	?	0	0	+	+	?
Park Street														
Park Street Option 1 (Allocate Park Street Area as Walsall's Main Retail Development Location): Park Street is allocated and promoted as the key location in the Town Centre for retail uses.	0	0	0	+	?	++	++	0	?	0	0	0	++	0
Park Street Option 2 (Allocate Park Place and Saddlers' Centre as Walsall's Main Retail Development Location): Park Place Shopping Centre and the Saddler's Centre should be allocated as the focus for retail-led development.	0	0	0	+	?	++	++	0	?	0	0	0	++	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
The Sites														
Flood Risk Management														
Flood Risk Management Option 1 (Strategic Approach to Water Management): The AAP takes a strategic approach to integrating water management infrastructure, such as Sustainable Drainage Systems, into the design of the public realm in the Town Centre.	0	?	?	0	?	?	0	+	+	0	0	?	0	++
Flood Risk Management Option 2 (Site-by-Site Approach to Water Management): The AAP considers that water management solutions should be considered on a site by site basis.	0	?	?	0	?	?	0	+	+	0	0	?	0	+

Key to the High Level Assessment Matrix	
Likely strong positive effect	++
Likely positive effect	+
Neutral/ no effect	0
Likely adverse effect	-
Likely strong adverse effect	--
Uncertain effects	?

Appendix F:

Other Options for the SAD – Options Considered “Unreasonable” and Not Subject to SA

Option Reference	SAD Topic Area	Brief Description of Option	Summary of why it is not “Reasonable”
General	All Topics	Insufficient land is allocated to deliver the BCCS spatial strategy and requirements	This would be contrary to the RSS and to planning policy already adopted by the Council, and would undermine the strategy and aspirations for the Black Country as a whole. It would also be contrary to the objectives of the SAD.
Housing Option 4	Housing	No land is allocated for new housing.	This would not accord with local or national planning policy on housing. Failure to make provision for delivery of new homes is also likely to cause further pressure on existing housing stock, impacting on the well-being of local communities from overcrowding and reduced access to housing.
Housing Option 5	Housing	No land is allocated for Gypsy and Travellers sites.	This would not accord with local or national planning policy on provision for gypsies and travellers. Failure to make adequate provision for delivery of new sites is also likely to impact on the well-being of gypsy and traveller communities and disadvantage these communities compared to other groups.
Land for Industry Option 5	Land for Industry	No land is allocated for industry.	This would not accord with local or national planning policy on provision for economic growth. It is also likely to lead to the further economic decline of the borough as it will not be able to compete for investment with other areas that have land for industry. This is also likely to significantly increase social problems related to poor economic performance, such as unemployment, poverty, deprivation and poor health.
Open Space Option 4	Open Space, Leisure and Community Facilities	No land is allocated for open space protection.	This would not accord with local or national planning policy and would leave open space vulnerable to pressure for development with other land-uses such as housing and employment land and would impact on objectives to improve access to walking, cycling and healthy outdoor recreation for local communities, particularly in areas of deficiency. Without an adequate, multi-functional network of open space, there will also be fewer opportunities to improve biodiversity, protect local amenity and the quality of local landscapes and townscapes, manage surface water to reduce the risk of flooding, or adapt to other potential effects of climate change such as “heat island” effects.
Environmental Network Option 3	Environmental Network	Sites around the Borough that are important for biodiversity and geodiversity and are designated for protection outside of the planning system are not recognised and therefore not protected when allocating land for new development.	This would not accord with local or national policy (or European legislation regarding the Habitats Directive) and would be contrary to Walsall Council’s work with the Birmingham and Black Country Sites Partnership and the Wildlife Trust in identifying sites for protection.
Environmental Network Option 4	Environmental Network	The risk of flooding to new development and the impacts on flood risk elsewhere arising from new development are not considered when allocating land for new development.	This would not accord with local or national planning policy on applying the sequential approach and test to identifying land for new development away from areas at greatest risk from flooding.
Waste Option 1d	Waste Management	No local waste management targets in support of meeting the targets identified in the BCCS and Waste Framework Directive.	This would be contrary to national and local policy on waste management. Waste arising in Walsall would continue to be exported to other areas for recycling, composting and energy recovery as it is less likely that facilities would be developed in the borough. This would impact on other areas and indirectly on local highway networks as waste would have further to travel. Opportunities to develop facilities in Walsall to use organic wastes to generate renewable energy are also less likely to be realised.

Option Reference	SAD Topic Area	Brief Description of Option	Summary of why it is not “Reasonable”
Minerals Option 1d	Minerals	No mineral safeguarding area (MSA) is defined.	This would be contrary to national and local policy on the safeguarding of mineral resources of potential local and national importance. Opportunities to safeguard minerals through “prior extraction” are more likely to be missed, because there would be no clearly defined MSA to show people where resources could be found in Walsall, leading to sterilisation and waste of resources.
Minerals Option 2	Minerals	No land is identified for potential mineral extraction.	This would be contrary to national and local policy on making adequate provision for the production of raw materials needed to support economic growth. It would also mean that Walsall was entirely reliant on imports of sand and gravel and brick clay from other areas, with consequential impacts on the local highway network as well as potential effects on air quality and on the amenity of communities living along the haulage routes.

Source: SAD Issues & Options Report (April 2013), Appendix 12a

Appendix G:

Other Options for the AAP – Options Considered “Unreasonable” and Not Subject to SA

Option Reference	SAD Topic Area	Brief Description of Option	Summary of why it is not “Reasonable”
Location of New Retail Option 4	A place for Shopping	No provision is made in the AAP for additional retail floorspace.	This would have serious implications on the centre’s ability to deliver the ambitious targets set for retail development. Walsall needs to deliver major retail investment in order to maintain and improve its market share against competition from centres such as Birmingham and Wolverhampton. A strategy for retail growth that offers opportunities in a phased and flexible way is the only way to ensure the health of Walsall.
The Location of Major New Office Development Option 3	A place for Business	No provision is made in the AAP for additional office floorspace.	This would have serious implications on the centre’s ability to deliver the ambitious targets set for office development. Walsall needs to deliver major office investment in order to attract new business and provide new jobs. Identifying land for new office floorspace is the only way to ensure the health of Walsall.
Industrial Uses Option 4	A place for Business	All industrial land in the town centre is allocated for alternative uses without any process of ensuring the current occupiers have suitable premises to relocate	This would impact on the businesses and may result in the loss of employment in the Borough. It would be against the principles of BCCS policies especially DEL2.

Source: AAP Issues & Options Report (April 2013), Appendix 3a