

**Walsall Town Centre Area Action Plan
Minor Examination Modifications Schedule
February 2018**

Walsall Town Centre Area Action Plan (AAP) is being examined by an independent Inspector, whose role is to assess whether the plan has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements and whether it is sound.

As part of the examination process the Inspector has identified a number of Main Modifications that are considered necessary to make the Plan sound. These modifications are available to view here:

www.walsall.gov.uk/walsall_town_centre_area_action_plan_examination

The Council is undertaking consultation on these Main Modifications for six weeks from **26th February – 5pm 9th April 2018**.

A number of Minor Modifications have also been produced by the Council which are available for information in the schedule below. These Minor Modifications do not change the meaning or scope of a policy, but are provided for clarity.

This table also includes 'Further Proposed Modifications'; these are modifications that were agreed by Cabinet and formed part of the AAP submitted to the inspector but have not been subject to public consultation, although they have been in the public domain since August 2017. Here applicable, the previous mod reference e.g. **FPMAAPX** has been included in addition to a new modification reference to allow for cross-reference with the schedule of Further Proposed Modifications that is available to view on the Council website here: www.walsall.gov.uk/walsall_town_centre_area_action_plan

A marked up version of the AAP has also been produced to show how the Main and Minor modifications would alter the final plan, this is available to view here: www.walsall.gov.uk/walsall_town_centre_area_action_plan_examination

This schedule of Minor Modification is for public information only and is not subject to formal consultation.

New text proposed is underlined. Deleted text is shown by ~~strikethrough~~. Text explaining the modification is in *italics*.

Reference	Submission Document Page Number	Policy Number/ Section Number/ Paragraph	Proposed Modification(s)	Reason for Modification(s)
No ref	Throughout the plan		Amendments to typos, spelling, grammar etc.	For accuracy.
No ref	Throughout the plan		Include “Policy” or “Policies” in front any policy references where it’s missing e.g. “as in accordance with <u>BCCS Policies CEN3 and CEN7</u> ”.	For accuracy.
No ref	Throughout the plan		Replace any reference to WMBC with <u>Walsall Council</u> or <u>The Council</u> .	For accuracy.
AAP1	Throughout the plan		Remove hyperlinks but keep/ amend footnotes to take account of this removal.	To prevent the plan becoming out of date by having broken weblinks.
AAP2	Throughout the plan		Amend date of publication for DTZ study Walsall Town Centre Demand Study and Development Sites Assessment from July to <u>September 2015</u> .	For accuracy.
AAP3	Throughout the plan		Amendments to evidence to provide dates and authors where missing.	For accuracy.
AAP4	Front cover inset page		Delete page.	Page is about how people can get involved in the consultation so it is no longer needed.
AAP5	List of abbreviations		Delete list.	All abbreviations are set out in the main plan so the list is duplication.
AAP6	1 – 9	Introduction	Re-write the Introduction chapter to reflect the stage of the plans development - See Appendix	For clarity.
AAP7	11	2.2.1 Policy Justification	<i>Add cross-reference to Policy AAPINV1: Regeneration Strategy as follows:</i> “The BCCS provides the basis for the AAP vision and the AAP needs to be consistent with the BCCS. The AAP objectives therefore build on this vision to provide clear aims for the policies and proposals in the plan to aspire to. <u>In particular AAP Policy</u>	To cross- reference a useful policy.

Reference	Submission Document Page Number	Policy Number/ Section Number/ Paragraph	Proposed Modification(s)	Reason for Modification(s)
			<u>AAPINV1: Regeneration Strategy provides a spatial approach to the vision and objectives of the AAP."</u>	
AAP8	24	Figure 3.1 A Place for Shopping Allocations	Replace current map with an updated map following the changes to the Leather Museum as a result of EXAMAAP4.	Update of mapping to ensure consistency with EXAMAAP4.
AAP9	24	Policy AAP2: New Retail Development 3.2.2 Evidence	<i>Add details of planning permissions to evidence as follows:</i> <ul style="list-style-type: none"> • <u>"Current planning permissions for retail developments (13/1421/FL Digbeth/ Lower Hall Lane and 14/1886/FL Old Square Shopping Centre)."</u> 	To reference relevant evidence.
AAP10	27	Policy AAP3: The New Walsall Market 3.3.2 Evidence	<i>Add the following the evidence list for policy</i> <ul style="list-style-type: none"> • <u>"St Matthew's Quarter – Relocation of Walsall Market, Final Report (September 2009) GVA Grimley.</u> • <u>St Matthew's Quarter, Walsall - Update of Evidence Base for Market Relocation (August 2010) GVA Grimley.</u> • <u>Walsall Market - Location Review and Evidence Base (February 2014) Arup."</u> 	To reference relevant evidence.
AAP11	31	Policy AAP1: Office Development 4.1.2 Evidence	<i>Add the following to the evidence list for policy</i> <ul style="list-style-type: none"> • <u>"Walsall Gigaport outline planning permission - planning reference 08/0951/OL and 11/1541/TE."</u> 	To reference relevant evidence.
AAP12	36	Policy AAP3: Town Centre Employment Land Sites in policy table	<i>Add following text to site TC34:</i> <u>"Secondary Development Sites as opportunities for mixed town centre uses (AAPINV6) and potential location for super car park - Policy AAPT5: Car Parking part i)."</u>	To make the document as useable as possible.

Reference	Submission Document Page Number	Policy Number/ Section Number/ Paragraph	Proposed Modification(s)	Reason for Modification(s)
AAP13 FPMAAP1	50	Policy AAPLE4: Walsall Canal 5.4.1 Policy Justification	<i>Addition to last paragraph:</i> <u>“Landscaping proposed along the canal corridor will need to be accompanied by appropriate management and maintenance plans to ensure the natural environment of the waterway is not adversely affected and that there is no impact to safe navigation of the waterway.”</u>	To provide useful information that will help to protect the canals environment.
AAP14	51	Policy AAPLE4: Walsall Canal 5.4.2 Evidence	<i>Add the following to the evidence list for policy:</i> <ul style="list-style-type: none"> <u>“Policy Advice Notice: Inland Waterways, Unlocking the Potential and Securing the Future of Inland Waterways through the Planning System (July 2009) Town and Country Planning Association and British Waterways.”</u> 	To reference relevant evidence.
AAP15	59	Policy AAPLV2: Education 6.2.2 Evidence	<i>Add the following to the evidence list for policy:</i> <ul style="list-style-type: none"> <u>“Education and Health Background Paper (April 2017) Walsall Council.”</u> 	To reference relevant evidence.
AAP16	61	Policy AAPLV3: Health Care Provision 6.3.2 Evidence	<i>Add the following to the evidence list for policy:</i> <ul style="list-style-type: none"> <u>“Education and Health Background Paper (April 2017) Walsall Council.”</u> 	To reference relevant evidence.
AAP17	68	Policy AAPLV5: Protecting and Enhancing Historic Character and Local Distinctiveness 6.5.2 Evidence	<i>Add the following to the evidence list for policy:</i> <ul style="list-style-type: none"> <u>“Bridge Street Townscape Heritage Initiative Projects Undertaken (October 2011) Walsall Council.</u> <u>Walsall Town Centre Historic Environment Site Assessment (March 2016) Walsall Council.”</u> 	To reference relevant evidence.

Reference	Submission Document Page Number	Policy Number/ Section Number/ Paragraph	Proposed Modification(s)	Reason for Modification(s)
AAP18	75	Policy AAPLV7: Enhancing the Public Realm 6.7.2 Evidence	<i>Add the following to the evidence list for policy:</i> <ul style="list-style-type: none"> • <u>“Walsall Wayfinding Strategy Document (August 2012) Urbed.”</u> 	To reference relevant evidence.
AAP19	80	Policy AAPT1: Pedestrian Movement, Access and Linkages 7.1.2 Evidence	<i>Add the following to the evidence list for policy:</i> <ul style="list-style-type: none"> • <u>“Walsall Wayfinding Strategy Document (August 2012) Urbed.”</u> 	To reference relevant evidence.
AAP20	90	Policy AAPT3: Public Transport 7.3.2 Evidence	<i>Add the following to the evidence list for policy:</i> <ul style="list-style-type: none"> • <u>“Black Country Air Quality Supplementary Planning Document (February 2017) Dudley, Sandwell, Walsall and Wolverhampton Councils.</u> • <u>Bradford Place Background Note (April 2017) Walsall Council.</u> • <u>Bradford Place Bus Facility Feasibility (May 2017) ch2m.”</u> 	To reference relevant evidence.
AAP21	93	Policy AAPT4: Road Improvements 7.4.1 Policy Justification	<i>Amend text in 5th paragraph of the Policy Justification as follows:</i> “In line with this Walsall proposes to <u>has adopted</u> a Black Country-wide Supplementary Planning Document (SPD) on air quality which aims to further address the issue of air quality (see also policy AAPINV7).”	To provide an update on the status of the document.
AAP22	93	Policy AAPT4: Road Improvements 7.4.2 Evidence	<i>Add the following to the evidence list for policy:</i> <ul style="list-style-type: none"> • <u>“Black Country Air Quality Supplementary Planning Document (February 2017) Dudley, Sandwell, Walsall and Wolverhampton Councils”</u> 	To reference relevant evidence.
AAP23	97, 98 - 101	Policy AAPT5: Car Parking 7.5.1 Policy Justification Part	<i>Include a cross reference to Policy AAPINV6: Secondary Development Sites where relevant (site TC34, TC21, TC30, TC31, TC34 and TC35) as follows:</i> “Opportunities for mixed town centre uses – <u>Policy AAPINV6: Secondary Development Sites.</u> ”	To provide clarity in the cross referencing of policies.

Reference	Submission Document Page Number	Policy Number/ Section Number/ Paragraph	Proposed Modification(s)	Reason for Modification(s)
		a) and Part b) tables		
AAP24	93	Policy AAPT5: Car Parking 7.5.2 Evidence	<i>Add the following to the evidence list for policy:</i> <ul style="list-style-type: none"> “<u>Black Country Air Quality Supplementary Planning Document (February 2017) Dudley, Sandwell, Walsall and Wolverhampton Councils.</u>” 	To reference relevant evidence.
AAP25	103	Policy AAPT5: Car Parking 7.5.3 Delivery	<i>Amend text as follows:</i> “ Once adopted The Air Quality SPD will be used to implement the delivery of electric vehicle charging points in the town centre.”	To provide an update on the status of the document.
AAP26	112	Policy AAPINV2: St Matthew’s Quarter 8.2.2 Evidence	<i>Add details as follows :</i> <ul style="list-style-type: none"> “<u>Planning application for the area (13/1421/FL Digbeth/ Lower Hall Lane and 14/1886/FL Old Square Shopping Centre).</u>” 	To reference relevant evidence.
AAP27	124	Policy AAPINV3: Walsall Gigaport Policy Justification site table	<i>Amend text for Site Details for TC49 as follows:</i> “ Site in use as museum. Aspirations to extend the museum to include Walsall Museum and Walsall Local History Centre. ”	To reflect proposed modification EXAMAAP4.
AAP28	129	Policy AAPINV3: Walsall Gigaport Figure 8.2	Amend Figure 8.2 Gigaport Area to remove allocation of ‘Opportunities for Leisure Investment’ from the leather museum.	To reflect the proposed modification EXAMAAP4.
AAP29	130	Policy AAPINV3: Walsall Gigaport 8.3.2 Evidence	<i>Update evidence listed as follows:</i> <ul style="list-style-type: none"> “Gigaport outline planning permission – planning reference 07/2659/OL/W7. Walsall Gigaport outline planning permission - planning reference 08/0951/OL and 11/1541/TE.” 	To reference relevant evidence.

Reference	Submission Document Page Number	Policy Number/ Section Number/ Paragraph	Proposed Modification(s)	Reason for Modification(s)
AAP30	132	Policy AAPINV4: Walsall Waterfront Part a)	<i>Amend planning application reference in last sentence of part a) of policy as follows: “07/2659/OL/W7 <u>13/0440/FL</u>”</i>	To amend a factual error for clarity.
AAP31 FPMAAP2	132	Policy AAPINV4: Walsall Waterfront Part d)	<i>Amend cross reference to part of policy in the last sentence of part d) of policy as follows: “Residential uses will be suitable at the Kirkpatrick's site (TC11) and FE Towe Ltd, Charles Street (TC15) if the criteria in Policy AAPLV1 (f) (b) can be met.”</i>	To correct a factual error for clarity.
AAP32	146	Policy AAPINV5: Park Street Shopping Core 8.5.2 Evidence	<i>Include the following in the list of evidence:</i> <ul style="list-style-type: none"> • <u>“Information provided in support of planning application for the New Walsall Market – planning reference 14/1871/FL.”</u> 	To reference relevant evidence.
AAP33	148 - 154	Policy AAPINV6: Secondary Development Sites	<i>Include a cross reference to car parking policy where relevant (sites 21, 30,31,34 and 35) as follows: “Council Car Parks for Redevelopment – Policy AAPT5 part b).”</i>	To make the plan as easy to use and as clear as possible.
AAP34 FPMAAP3	161	Policy AAPINV7: Addressing Potential Site Constraints 8.7.1 Policy Justification AAPINV7(a) Flooding	<i>Amend first sentence of last paragraph of section a) Flooding as follows: “Overall, as the chance of a blockage is low but there is some possibility of the or capacity being exceeded, is extremely low an early warning system is considered the best solution to managing flood risk in the centre.”</i>	In response to correspondence from the Environment Agency.

Reference	Submission Document Page Number	Policy Number/ Section Number/ Paragraph	Proposed Modification(s)	Reason for Modification(s)
AAP35	165	Policy AAPINV7: Addressing Potential Site Constraints 8.1.2 Evidence	<p><i>Update the evidence list to delete and include the following:</i></p> <ul style="list-style-type: none"> • <u>“Humber River Basin Management Plan (December 2009) Environment Agency.</u> • Walsall Cabinet Report and Draft Air Quality Supplementary Planning Document (February 2016). • <u>Black Country Local Flood Risk Management Strategy (February 2016) Dudley, Sandwell, Walsall, Wolverhampton Councils and WSP Parsons Brinckerhoff.</u> • <u>Preparatory Work for Walsall Local Flood Risk Management Strategy, JBA (Mapping produced 2013, document published December 2016).</u> • <u>Black Country Air Quality Supplementary Planning Document (February 2017) Dudley, Sandwell, Walsall and Wolverhampton Councils.”</u> 	To reference relevant evidence.
AAP36 FPMAAP4	165	Policy AAPINV7: Addressing Potential Site Constraints 8.1.3 Delivery	<p><i>Update first bullet point as follows:</i></p> <ul style="list-style-type: none"> • “Look to deliver through CH <u>Support the Environment Agency in delivering an early warning system for the centre to reduce the impact of flooding on developments and the cost of mitigation on developers;”</u> 	In response to correspondence from the Environment Agency.
AAP37	165	Policy AAPINV7: Addressing Potential Site Constraints 8.1.3 Delivery	<p><i>Update second bullet point as follows:</i></p> <ul style="list-style-type: none"> • “Work in partnership with the other Black Country authorities to adopt <u>implement the requirements</u> in the an air quality SPD that will look to mitigate against the impacts of air pollution, especially from vehicle emissions;” 	To provide an update on the status of the document.

Reference	Submission Document Page Number	Policy Number/ Section Number/ Paragraph	Proposed Modification(s)	Reason for Modification(s)
AAP38	167	Chapter 9. Get Involved	<i>Delete chapter (also remove for contents list at front of document)</i>	Chapter is about how people can get involved in the consultation so it is no longer needed.
AAP39	AAP Policies Map	AAP Policies Map	<i>Update title of map from 'Walsall Town Centre Area Action Plan Publication Policies Map' to "<u>Walsall Town Centre Area Action Plan Inset of the Local Plan Policies Map.</u>"</i>	To reflect the proposed modification EXAMAAP1.
AAP40	AAP Policies Map	AAP Policies Map	<i>Remove allocation of "Opportunities for Leisure Investment" from the leather museum (TC49) and expand the college allocation to cover the area (TC45). Expand the boundary of the Gigaport Masterplan Boundary to exclude the museum buildings in line with 11/1541/TE outline map.</i>	To reflect the proposed modification EXAMAAP4.

AAP APPENDIX 2

1. Introduction AAP6

1.1 Purpose of the Town Centre Area Action Plan (AAP)

The AAP is a long term plan that allocates sites within the town centre for the development of new shops, leisure opportunities and offices, as well as setting out policies and proposals for other aspects of the town centre, including transportation and the environment. It provides a clear vision for the town centre that we can all work towards. The plan identifies a strategy for the regeneration of the town that helps to promote sites for development and identify Council priorities.

The AAP is part of Walsall's Local Plan and sets the planning framework for the town centre. It provides the basis on which planning and investment decisions within the area are made. **Chapter 2** sets out the boundary for Walsall Town Centre AAP. It also sets out the vision and objectives for the AAP, which is then reflected spatially in AAP Policy INV1: Regeneration Strategy. This is the overarching policy for the delivery of the strategy for the town centre.

The production of such a detailed and robust plan reflects the importance of Walsall town centre. The health of the town centre has an impact on the economy of the whole Borough. Walsall town centre is the most accessible location to serve the catchment area and to benefit the maximum number of people, particularly in offering increased employment and training opportunities. It is therefore the most sustainable location for development in the Borough. However, the town centre economy has significantly under-performed against the national and regional average over the past 10 years with high levels of vacant units and decreased amounts of investment in the centre.

While there has been a considerable level of regeneration activity in the town centre in recent years, this has tended to focus on a small number of large scale projects. Whilst the delivery of these projects is important to the overall regeneration of the town centre, there is a need for a regeneration strategy for the centre as a whole. The town centre would benefit from a long-term spatial plan setting out its function in terms of retail, leisure and culture, education, office-based employment and housing, provided within a high quality environment. This AAP therefore provides the planning framework to support the regeneration of the town centre in the short, medium and long term.

1.2 The Planning Context

The AAP will form part of the ‘Local Plan’. This is the plan for the future development of the Borough which is drawn up by the Council in consultation with the community. In law this is described as the “development plan”. **Figure 1.1** provides an overview of the key stages behind the AAPs production including the various stages of public consultation.

The National Planning Policy Framework (NPPF) sets out the Government’s position on the role of the planning system in both plan-making and decision-taking. It states that the purpose of the planning system is to contribute to the achievement of sustainable development, in economic, social and environmental terms. The Framework must be taken into account in the preparation of plans.

The NPPF sets out core land-use planning principles that should underpin both plan-making and decision making. These include

- driving and supporting sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs,
- securing high quality design and a good standard of amenity for all existing and future occupants of land and buildings,
- supporting the transition to a low carbon future in a changing climate,
- taking full account of flood risk,
- contributing to conserving and enhancing the natural environment and reducing pollution,
- reusing land that has been previously developed,
- managing patterns of growth to make the fullest possible use of public transport, walking and cycling,
- taking account of local strategies to improve health, social and cultural wellbeing for all,
- and delivering sufficient community and cultural facilities and services to meet local needs.



Figure 1.1 AAP Production Process

On a more local level the Black Country authorities (Walsall, Wolverhampton, Sandwell and Dudley) prepared a Joint Core Strategy, which was adopted by Walsall Council in February 2011. As a strategic plan for the whole of the Black Country, the **Black Country Core Strategy (BCCS)** seeks to direct investment in retail, leisure and offices across the area. It emphasises that strategic centres such as Walsall should be the focus of large-scale investment in retail, offices and leisure. The AAP supersedes the information within Appendix 2 of the BCCS (SC3), which sets out an indicative spatial plan for Walsall Town Centre.

The Black Country Councils are committed to a review of the BCCS. This review will have to consider the long-term strategy for the regeneration of the Black Country. This will include consideration of future development needs (such as projections of housing growth) and will have to assess a range of strategic matters, including planning the future of the Black Country Centres.

Walsall's local plan also includes **Walsall Unitary Development Plan (UDP)**. Most of the UDP policies are 'saved' policies; however, some were removed as a result of changes to planning legislation in 2004 or have been superseded by policies within the BCCS. The AAP supersedes some of the UDP policies, especially those within the Inset plan that covers Walsall Town Centre. However some of the 'saved' policies within the UDP are referenced within this AAP as they still provide a good policy basis to assess proposals against; the AAP avoids repeating existing policy where possible. It is intended that the UDP 'saved' policies will remain in place until a new Development Management Plan is produced for Walsall. **An appendix to the AAP provides a list of UDP Saved and Superseded Policies. It also provides references to those UDP Policies that are directly referenced in the AAP.** MM3

1.3 Structure of the AAP

This chapter introduces the AAP by setting out the plan's purpose, the planning context and the need for a plan for Walsall Town Centre.

Chapter 2 sets out the boundary for the AAP, presents the vision for Walsall town centre, and provides the objectives that the AAP aims to deliver.

The rest of the document is divided into chapters covering key elements that make up the centre, as summarised below. Each chapter has a number of policies which will deliver the vision and objectives of the AAP. For each policy there is a justification section. The Draft Plan also provides a list of the key evidence used to inform the plan along with an overview of how the policy will be delivered. Further details of how the plan will be delivered can be found in the Site Allocation Document and Town Centre

AAP Delivery Document which can be viewed on our evidence page. Finally, for each policy there is an indication of how the policy will be monitored. Where possible, current indicators have been used from the BCCS or the UDP.



Chapter 3 is about Walsall as a Place for Shopping. It provides policies for the Primary Shopping Area, new retail investment including retail floorspace targets and a policy for the new Walsall Market.



Chapter 4 focuses on Walsall as a Place for Business. It provides policies for new office floorspace and for investment in the current office stock along with proposing a social enterprise zone. The chapter also covers the current industrial land within the centre, looking to protect any active businesses while providing opportunities for redevelopment if the industry relocates.

Chapter 5 focuses on Walsall town centre as a Place for Leisure. This chapter has a policy for new leisure development along with a policy to protect and enhance current sport and cultural facilities. It also includes a policy promoting further hotel, conference and banqueting facilities investment in the centre. Finally the chapter includes a policy on the canal to ensure it is protected whilst offering a high quality leisure destination in Walsall.



Chapter 6 looks at Walsall as a Place for Living. This chapter includes policies on housing, education and health, community facilities, the character of the town and the quality of the public realm, and the environmental infrastructure of the town centre.

Chapter 7 looks at transportation, access to and movement within the town centre. This is a key chapter because good access to the town is vital to the successful delivery of town centre regeneration. This chapter includes policies on pedestrian linkages, cycling, public transport, the road network, and town centre parking.

Finally **Chapter 8** focuses on Walsall as a Place for Investment. This chapter provides policies for the key areas within the town centre which are opportunities for major redevelopment, as well as secondary development opportunity sites within the town centre. This chapter also includes a policy around overcoming constraints in the centre.



A number of the policies in the AAP relate to allocations or designations on the AAP Inset of the Local Plan Policies Map and this should be considered alongside this Plan.

1.5 Key evidence consulted

A wide range of background documents have been used to inform the production of the AAP. All of this evidence is available to view on the Council's website.

A **Sustainability Appraisal** (SA) was undertaken throughout the production of the AAP. The SA is a method of identifying potentially significant environmental, social and economic effects of the proposals in the plan, so that harmful effects can be identified early on, and addressed where feasible.

The SA has included an evaluation of the sustainability of the AAP Objectives, an appraisal of the Options for the AAP, and an appraisal of the AAP policies and proposals. The SA also included equality and health impact assessments to ensure these impacts are fully evaluated.

A screening exercise in respect of the possible requirement for a **Habitats Regulations Assessment** (HRA) was conducted as part of the preparation of the Black Country Core Strategy (BCCS). The screening has formed the starting point for the assessment of all other subsequent Local Plan documents in Walsall. The HRA work for the BCCS could not rule out the possibility of likely significant effects in respect of Cannock Chase SAC, and the Humber Estuary SAC/SPA/Ramsar¹ as a result of implementing the strategy.

The basis for the future assessment of Local Plan documents is provided in paragraph 6.4 of the BCCS, which states:

“6.4 The development of housing with its associated population growth may lead to indirect adverse impacts on Cannock Chase SAC. This is likely to be caused by increased visitor activities on Cannock Chase and is the subject of ongoing research. Depending on the outcome of this research, development plans and proposals may be required to demonstrate appropriate and proportionate measures sufficient to avoid or mitigate significant identified adverse impacts. Guidance may be given through subsequent local development plan documents.”

The interpretation of the available evidence in respect of potential impacts to Cannock Chase SAC, as a result of increased recreational pressure associated with new

¹ The Humber Estuary SAC/SPA/Ramsar was also considered as part of the BCCS HRA (<http://blackcountrycorestrategy.dudley.gov.uk/EasysiteWeb/getresource.axd?AssetID=10276&type=full&service=Attachment>). However, since then no further technical work or correspondence has identified a need to develop a package of measures to mitigate any effects resulting from projects and / or plans in Walsall. The BCCS HRA screening also could not rule out the possibility of likely significant effects in respect of the Severn Estuary SAC/SPA/Ramsar, but this applies to areas of the Black Country other than Walsall as there is no apparent impact pathway linking it with Walsall. **AAP1**

housing development resulting in a net increase of housing, has resulted in the identification of a 15km Zone of Influence (ZOI) emerging from the SAC boundary. This ZOI extends to overlap with the Walsall Town Centre AAP boundary. The council has set out its position in respect of the identified ZOI in its HRA screening assessment which accompanies the SAD and AAP.

However, specifically in respect of the AAP, the affected area is small and the plan proposes only office and educational uses within it. These uses are not within scope of the current strategic mitigation approach for the SAC, and if residential development were to have been proposed in this area through the AAP the council believes the effects of new residents could be screened out on the basis of the distance from the SAC and the visitor profile that can be deduced using the available visitor survey data. In addition, the strategic mitigation approach opted for, in respect of the SAC, requires developer contributions only from residential development within 8km of the SAC (the Zone of Payment - ZOP) that results in a net increase of housing, the AAP is not affected by the ZOP. Consequently, the AAP does not propose the form of development capable of resulting in adverse effects to the SAC, it is also a significant distance from the SAC. On this basis likely significant effects as a result of implementing the AAP have been screened out.

Where the AAP document has drawn upon or identified particular assets and constraints that might need to be taken into account in the application of AAP (and other) policies, these have been set out in **Technical Appendices**

