

Appendix N:

Sustainability Appraisal of Walsall Site Allocation Document (SAD):

Appraisal of Options for Mitigation of Potential Effects of Walsall SAD on Cannock Chase SAC

See SAD SA Options Appraisal Matrix (Excel Spreadsheet) for Full Details of SA Results for Each Option

Appraisal of Options for Cannock Chase SAC Mitigation (January 2016) – SA Scoring

Walsall SAD & AAP – Revised SA Objectives (July 2015)														
Cannock Chase Mitigation Options	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Cannock Chase SAC Option 1 (Adopt 15km as a default area) Adopt 15km ZOI as the default area from which all residential development is required to undertake HRA	-	-	-	-	-	0	-	-	-	-	-	--	-	-
Cannock Chase SAC Option 2 (Sign the SAC Partnership MOU) Sign up to the MOU accepting the SAMM, 15km as the ZOI, and the proposed 8km Payment Zone (subject to change)	-	-	-	-	-	0	-	-	-	-	-	--	-	-
Cannock Chase SAC Option 3 (Adopt 8km as the ZOI) Adopt an 8km ZOI as an alternative ZOI based on the visitor survey findings	+	+	+	+	+	+	+	+	++	+	+	++	+	0
Cannock Chase SAC Option 4 (Adopt findings and conclusions of more recent HRA) Adopt the findings and conclusions of most recent HRA work undertaken by the AONB Partnership	+	+	+	+	+	+	+	+	++	+	+	++	+	0
Cannock Chase SAC Option 5 (Extend scope of development required to make contributions) Extend the scope of developer contributions to fund the strategic mitigation approach to include leisure developments as well as residential	?	?	?	?	?	?	?	?	?	?	?	?	?	?
Cannock Chase SAC Option 6 (Restrict or stop active promotion) Restrict or stop the active promotion of the area for recreation and leisure	This is not a "reasonable alternative" and has therefore not been subjected to SA.													
Cannock Chase SAC Option 7 (Identify a ZOI based on activities such as walking and dog walking) Identify a ZOI based on effects associated with activities that can more reasonably be linked to a generic increase in development (e.g. walking and dog walking)	-	-	-	-	-	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	?

Revised SAD and AAP SA Objectives (July 2015)

SA1	Air Quality - Minimise emissions of potentially harmful air pollutants from new development in Walsall and exposure of "sensitive receptors" to poor air quality in the parts of Walsall Borough where monitoring shows that the national air quality objectives for nitrogen dioxide (NO ₂) are not being met and/ or that there are high levels of other potentially harmful air pollutants
SA2	Biodiversity and Geodiversity - Conserve, protect, enhance and restore Walsall's biodiversity and geodiversity by ensuring that new development contributes towards the establishment of coherent and resilient ecological networks, makes provision for enhancement of biodiversity and geological conservation wherever possible, and does not harm the integrity of European Sites or cause further loss, harm or deterioration of designated sites, other important wildlife habitats, and geological features, or compromise existing ecological networks
SA3	Climate Change - Reduce Walsall's contribution towards climate change and adapt to the unavoidable effects of climate change on the Borough, by promoting developments that avoid, reduce or minimise emissions of harmful greenhouse gases, including carbon dioxide (CO ₂), 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 well designed housing that meets current and future housing needs in locations that support the transition to a low carbon future and are resilient to the unavoidable effects of climate change, have a good standard of amenity and are accessible to existing and planned employment areas and social infrastructure; enable the development of appropriately located new social infrastructure where there is a need, and ensure that other new developments will have a positive effect on the quality of life for local communities, and will not be harmful to their amenity, health and well-being
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 appropriate and accessible locations to meet the needs of local businesses and potential investors, without compromising the amenity of local communities or the operation of other businesses, by helping to address barriers to sustainable economic growth and investment where possible, such as providing new infrastructure where it is needed to support existing and future businesses, and by identifying opportunities for retail, office and leisure development in centres to meet anticipated requirements
SA7	Equality and Diversity - Reduce inequalities which result from social-economic disadvantage by ensuring that the diverse needs of communities in Walsall are met by planned housing and other developments, and ensure that groups or individuals with protected characteristics, as defined in the Equalities Act 2010, do not suffer direct or indirect discrimination as a result of policies that are included or omitted, including ensuring that developments intended for use specifically by protected or disadvantaged groups, or by them in conjunction with others, are in accessible locations, which are not exposed to significant environmental problems and are likely to be resilient to climate change effects
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 the health, safety and wellbeing of local communities and people who visit Walsall for work, shopping or leisure, by developing new health and social care facilities where there is a need, and by ensuring that health and social care facilities are accessible to those they are meant to serve and are likely to be resilient to climate change effects
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 by safeguarding mineral resources and mineral and waste infrastructure, by addressing identified mineral supply requirements, by supporting proposals that would reduce waste and manage unavoidable waste in accordance with the "waste hierarchy," and by enabling the provision of the infrastructure needed for treatment, transfer and disposal of waste and manufacture and distribution of mineral products in appropriate locations, where operations will not endanger human health, or cause unacceptable harm to the environment, or the amenity and wellbeing of local communities
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 including waste that cannot be re-used or recycled, by identifying opportunities for co-location of new energy generating infrastructure near to complementary land uses where there is scope to use residual heat, and by delivering more affordable, secure and reliable supplies of energy to local communities and businesses, in ways that will not generate harmful pollutants or have other adverse effects on the environment, and will be resilient to climate change effects
SA12	Soil and Ground Conditions - Maintain and improve the quality of Walsall's soils and land, by avoiding development of greenfield land, including the "best and most versatile" agricultural land, where previously-developed land or lesser quality greenfield land is available, by encouraging development likely to use soils, land and buildings efficiently, re-use or recycle construction, demolition and excavation wastes, and bring 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 and adjoining parts of the West Midlands urban area, reduce the vulnerability of transport infrastructure to climate change effects, reduce the impacts of transport on the environment and on the health, 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 or water treatment and supply infrastructure, including increasing vulnerability of such infrastructure to climate change effects, and that any waste water likely to be generated by new development can be managed in ways that minimise the risk of flooding and pollution of surface and groundwater

Options Appraisal Results - Commentary

Cannock Chase Mitigation Options	Overall SA Score	Commentary on Appraisal Results
<p>Cannock Chase SAC Option 1 (Adopt 15km as a default area) Adopt 15km ZOI as the default area from which all residential development is required to undertake HRA</p>	-	<p>Option 1 is likely to have adverse effects on the SA Objectives overall, as it would require all residential development proposals (of 1 house or more) to be subject to HRA, and if necessary undertake 'appropriate assessment' and provide or contribute towards mitigating any likely significant effects. The Option presents an administrative burden with additional costs to developers and the Council in respect of all residential applications. The administrative costs are particularly high in respect of development in Walsall due to many of the SAD housing allocations being of a small or modest size. Also, it has the potential to result in delays or the refusal of planning applications if proposals cannot be 'screened out' through HRA and are required to progress to 'appropriate assessment.' Many of the SAD's residential allocations are brownfield sites with several constraints to development. The Deliverability and Viability Studies commissioned by the Council from DTZ in 2015 indicate that development constraints, along with other factors affecting land values in the area, result in some SAD housing allocations within the proposed 15km ZOI being potentially unviable. In this context, if developer contributions were to be required from residential developments to overcome impacts to Cannock Chase SAC, a European protected site, and viability evidence indicates that no contributions can be secured, according to NPPF paragraphs 118 and 119, planning permission should be refused. In this scenario, Walsall Council would be forced to abandon urban regeneration in order to allocate viable greenfield / Green Belt sites that are likely to be in closer proximity to Cannock Chase SAC, and the Cannock Chase Extension Canal SAC. The effects associated with attempting to protect Cannock Chase SAC, according to the proposed 15km ZOI of the SAC Partnership's MOU, have the potential to result in adverse effects upon the majority of the SA Objectives, as a sustainable pattern of development could not be delivered. Also, there is likely to be strong adverse effects on SA12 as brownfield land would remain un-remediated as development shifts to greenfield land, impacting on the Green Belt and agricultural land.</p>
<p>Cannock Chase SAC Option 2 (Sign the SAC Partnership MOU) Sign up to the MOU accepting the SAMM, 15km as the ZOI, and the proposed 8km Payment Zone (subject to change)</p>	-	<p>Option 2 is likely to have adverse effects on the SA Objectives overall. Although the 2015 Cannock Chase SAC Partnership MOU exclusively seeks developer contributions from within 8km of the SAC boundary these contributions supposedly also mitigate the adverse effects of recreational pressure from a net increase in housing development between 8 - 15km of the SAC. Whilst an 8km payment zone has no effect on the housing allocations made within the SAD at present, the MOU is scheduled to be reviewed within the plan period (circa 2020). Consequently the Council cannot rule out the possibility of this payment zone being extended as a result of the MOU 5 yearly review and must take into account the effect this would have on the delivery of the SAD and other DPDs. The Deliverability and Viability Studies commissioned by the Council from DTZ in 2015 indicate that development constraints, along with other factors affecting land values in the area, result in some SAD housing allocations within the proposed 15km ZOI being potentially unviable. In this context, if developer contributions were to be required from residential developments to overcome impacts to Cannock Chase SAC, a European protected site, and viability evidence indicates that no contributions can be secured, according to NPPF paragraphs 118 and 119, planning permission should be refused. In this scenario, Walsall Council would be forced to abandon urban regeneration in order to allocate viable greenfield / Green Belt sites that are likely to be in closer proximity to Cannock Chase SAC, and the Cannock Chase Extension Canal SAC. The effects associated with attempting to protect Cannock Chase SAC, according to the proposed 15km ZOI of the SAC Partnership's MOU, have the potential to result in adverse effects upon the majority of the SA objectives, as a sustainable pattern of development could not be delivered. Also, there is likely to be strong adverse effects on SA12 as brownfield land would remain un-remediated as development shifts to greenfield land, impacting on the Green Belt and agricultural land.</p>
<p>Cannock Chase SAC Option 3 (Adopt 8km as the ZOI) Adopt an 8km ZOI as an alternative ZOI based on the visitor survey findings</p>	+	<p>Option 3 is likely to have a positive effect on most of the SA Objectives as an 8km ZOI would not have the potential to result in the refusal of planning applications where viability dictates that no developer contributions can be sought. This would ensure the delivery of housing on brownfield sites first rather than greenfield sites. The benefits of a sustainable pattern of development are wide ranging, but in general, the brownfield sites allocated for housing in the SAD are in sustainable locations with access to a multitude of sustainable transport options, are near to social infrastructure, and this Option will ensure that previously developed land is remediated and bring investment into deprived areas.</p>
<p>Cannock Chase SAC Option 4 (Adopt findings and conclusions of more recent HRA) Adopt the findings and conclusions of most recent HRA work undertaken by the AONB Partnership</p>	+	<p>Option 4 is likely to have a positive effect on most of the SA Objectives as more recent HRA work by the Cannock Chase AONB Partnership has 'screened out' likely significant effects associated with increased recreational pressure. This removes the potential to result in the refusal of planning applications where viability dictates that no developer contributions can be sought. This would ensure the delivery of housing on brownfield sites first rather than greenfield sites, in accordance with the BCCS sustainability principles. The benefits of a sustainable pattern of development are wide ranging, but in general, the brownfield sites allocated for housing in the SAD are in sustainable locations with access to a multitude of sustainable transport options, are near to social infrastructure, and this option will ensure that previously developed land is remediated and bring investment into deprived areas.</p>

<p>Cannock Chase SAC Option 5 (Extend scope of development required to make contributions) Extend the scope of developer contributions to fund the strategic mitigation approach to include leisure developments as well as residential</p>	?	<p>Option 5 is likely to have an uncertain effect on the SA Objectives as the resulting impact on the proposed ZOI of taking into account contribution from other types of development (e.g. Hotels, Out-of-Centre retail and leisure) has not been explored fully.</p>
<p>Cannock Chase SAC Option 6 (Restrict or stop active promotion) Restrict or stop the active promotion of the area for recreation and leisure</p>	N/A	<p>Option 6 is not a 'reasonable alternative' for the SAD, as none of Cannock Chase is in Walsall Borough so the Council does not have any influence over the delivery of this option through the SAD or through any other mechanisms. Furthermore, much of Cannock Chase is common land so scope to restrict access to it is limited. Also, neither is it realistic, considering the number of stakeholders involved with a vested interest in the area as a tourist attraction, to expect that it will not continue to be advertised nationally for tourism.</p>
<p>Cannock Chase SAC Option 7 (Identify a ZOI based on activities such as walking and dog walking) Identify a ZOI based on effects associated with activities that can more reasonably be linked to a generic increase in development (e.g. walking and dog walking)</p>		<p>Option 7 is likely to have adverse effects on the SA Objectives overall. Although the 2015 Cannock Chase SAC Partnership MOU exclusively seeks developer contributions from within 8km of the SAC boundary these contributions supposedly also mitigate the adverse effects of recreational pressure from a net increase in housing development between 8 - 15km of the SAC. Whilst taking into account only walking and dog walking (activities that can be taken part in by most able-bodied people), based on the current interpretation and application of the findings of the Cannock Chase Visitor Survey by Natural England and other authorities, it is likely this Option would reduce the proposed ZOI by 2-3km. At present an 8km payment zone has no affect on the housing allocations in the SAD. However, the MOU is scheduled to be reviewed within the plan period (circa 2020). Consequently the Council cannot rule out the possibility of this payment zone being extended as a result of the MOU 5 yearly review, and must take into account the effect this would have on the delivery of the SAD and other DPDs. Many of the SAD's residential allocations are brownfield sites with numerous constraints to development. The Deliverability and Viability Studies commissioned by the Council from DTZ in 2015 indicate that development constraints, along with other factors affecting land values in the area, result in some SAD housing allocations within the proposed 15km ZOI being potentially unviable. In this context, if developer contributions were to be required from residential developments to overcome impacts to Cannock Chase SAC, a European protected site, and viability evidence indicates that no contributions can be secured, according to NPPF paragraphs 118 and 119, planning permission should be refused. In this scenario, Walsall Council would be forced to abandon urban regeneration in order to allocate viable greenfield / Green Belt sites that are likely to be in closer proximity to Cannock Chase SAC, and the Cannock Chase Extension Canal SAC. The effects associated with attempting to protect Cannock Chase SAC, according to the proposed 15km ZOI of the SAC Partnership's MOU, have the potential to result in adverse effects upon the majority of the SA Objectives, as a sustainable pattern of development could not be delivered. Also, there are likely to be strong adverse effects on SA12 as brownfield land would remain un-remediated as development shifts to greenfield land, impacting on the Green Belt and agricultural land.</p>