

## **10. Monitoring the Effects of the SAD and AAP**

### **10.1 Current Monitoring Arrangements**

The Council already monitors the effects of implementing existing local plan policies through the Authorities' Monitoring Reports (AMRs) which are published annually on the Council website. These reports measure the extent to which the main requirements in the BCCS and UDP policies are being met, for example, whether the targets for new housing, employment and 'town centre' development are being achieved, and whether impacts on environmental assets are being effectively controlled.

Other monitoring arrangements are also in place at a sub-national level to monitor delivery of new housing, employment and 'town centre' development, and to monitor production of aggregate minerals, across the West Midlands. The data gathered through these arrangements contributes towards local monitoring reported through the AMRs.

The SAD and AAP identify the indicators and targets that will be used to monitor the extent to which the Policies are being implemented and the site allocations identified are being delivered, following adoption. It is proposed that where possible, the same indicators used to measure implementation of the BCCS and UDP policies will be used to measure implementation of the SAD and AAP Policies, as many of them rely on common data sets to measure performance.

For example, SAD Monitoring Indicator HC1a (Number of additional dwellings completed (net)) corresponds to BCCS Monitoring Indicator COI HOU1a, SAD Monitoring Indicator IND1a (Employment Land Completions by Local Authority (ha) corresponds to BCCS Monitoring Indicators LOI EMP1a and DEL2b, and AAP Monitoring Indicator AAPLV5.1 (the proportion of planning permissions granted in accordance with Conservation / Historic Environment Section or Advisor recommendations) corresponds to BCCS Monitoring Indicator LOI ENV2.

However, it has not been possible to match most of the AAP indicators to BCCS indicators, as they are specific to the delivery of the policies for specific sites or areas within the Town Centre, which are not identified for development in the BCCS as it is a high level plan.

The table below sets out how the monitoring indicators in the SAD and AAP relate to the SA objectives demonstrating how these can be used to monitor the impact on the plan on these objectives.

SA Objective	Monitoring Indicator SAD	Monitoring Indicator AAP
SA1 – Air Quality	<ul style="list-style-type: none"> <li>• Monitored through the ‘Movement for Growth’ monitoring indicators</li> </ul>	<ul style="list-style-type: none"> <li>• Monitored through the ‘Movement for Growth’ monitoring indicators</li> <li>• Proportion of planning applications granted in accordance with Air Quality/Environmental Protection Sections recommendations.</li> <li>• Proportion of major planning permissions including green infrastructure</li> <li>• Proportion of new greenways implemented</li> <li>• Increase in cycle use and implementation of proposed cycle routes</li> <li>• Implementation of public transport improvements</li> <li>• Highway improvements implemented</li> <li>• Number of car parking spaces</li> <li>• Number of electric vehicle charging points</li> </ul>
SA2 – Biodiversity and Geodiversity	<ul style="list-style-type: none"> <li>• Level of accessible open space</li> <li>• Number of proposals that reduce the extent of existing greenways,</li> <li>• The extent to which the Green Belt is protected from inappropriate development</li> <li>• Any reduction in area of designated nature conservation sites through development</li> <li>• Number of applications granted in accordance with the Canal and River Trust planning related advice</li> <li>• Proportion of new housing built on previously developed land</li> </ul>	<ul style="list-style-type: none"> <li>• Number of applications granted in accordance with the Canal and River Trust planning related advice</li> <li>• Proportion of major planning permissions including green infrastructure</li> <li>• Proportion of new greenways implemented</li> </ul>

SA3 – Climate Change	<ul style="list-style-type: none"> <li>• Number of applications granted in accordance with the Environment Agency comments</li> </ul>	<ul style="list-style-type: none"> <li>• Proportion of major planning permissions including green infrastructure</li> <li>• Proportion of new greenways implemented</li> <li>• Increase in cycle use and implementation of proposed cycle routes</li> <li>• Implementation of public transport improvements</li> <li>• Highway improvements implemented</li> <li>• Number of electric vehicle charging points</li> <li>• Number of major developments with SuDs</li> </ul>
SA4 – Communities and Population	<ul style="list-style-type: none"> <li>• Number of new dwellings built</li> <li>• Proportion of new dwellings that are affordable</li> <li>• Number of new beds in specialist housing</li> <li>• Number of new travelling pitches and showpeople plots provided</li> </ul>	<ul style="list-style-type: none"> <li>• Additional leisure floorspace</li> <li>• Loss of sport or cultural facilities</li> <li>• Additional housing in the centre</li> <li>• Additional education, healthcare and community floorspace in the centre</li> <li>• Loss if significant healthcare or community facilities</li> <li>• Proportion of new greenways implemented</li> <li>• Increase in cycle use and implementation of proposed cycle routes</li> </ul>
SA5 – Cultural Heritage	<ul style="list-style-type: none"> <li>• Number of applications in accordance with Historic England’s advice</li> <li>• The number of buildings on the Heritage at Risk Register</li> </ul>	<ul style="list-style-type: none"> <li>• Loss of cultural facilities</li> <li>• Number of applications in accordance with Historic England’s advice</li> <li>• The number of buildings on the Heritage at Risk Register</li> <li>• Protection of listed and locally listed buildings</li> <li>• Proportion of applications adequately addressing the characterisation study</li> </ul>

<p>SA6 – Economy and Centres</p>	<ul style="list-style-type: none"> <li>• Proportion of new housing built on previously developed land</li> <li>• Employment land completions</li> <li>• Loss of employment land</li> <li>• Amount of additional floorspace for town centre uses within local centres</li> </ul>	<ul style="list-style-type: none"> <li>• Amount of floorspace for town centre uses completed within the town centre boundary</li> <li>• The extent of vacant floorspace in the primary shopping area</li> <li>• Amount of additional office floorspace and the amount refurbished</li> <li>• Number of social enterprises active in the centre</li> <li>• Planning permission granted for consider for release employment land</li> <li>• Additional leisure floorspace</li> <li>• Loss of sport or cultural facilities</li> <li>• Number of hotel, banqueting or conference facilities</li> <li>• Number of schemes delivered that include public realm improvements</li> <li>• Implementation of public transport improvements</li> </ul>
<p>SA7 – Equality and Diversity</p>	<ul style="list-style-type: none"> <li>• Proportion of new dwellings that are affordable</li> <li>• Number of new beds in specialist housing</li> <li>• Number of new travelling pitches and showpeople plots provided</li> <li>• Amount of additional floorspace for town centre uses within local centres</li> </ul>	<ul style="list-style-type: none"> <li>• Number of social enterprises active in the centre</li> <li>• Additional education, healthcare and community floorspace in the centre</li> <li>• Implementation of public transport improvements</li> </ul>
<p>SA8 – Health and Wellbeing</p>	<ul style="list-style-type: none"> <li>• Number of new beds in specialist housing</li> <li>• Amount of additional floorspace for town centre uses within local centres</li> </ul>	<ul style="list-style-type: none"> <li>• Number of social enterprises active in the centre</li> <li>• Additional leisure floorspace</li> <li>• Loss of sport facilities</li> <li>• Additional education, healthcare and community floorspace in the centre</li> <li>• Loss if significant</li> </ul>

		<p>healthcare or community facilities</p> <ul style="list-style-type: none"> <li>• Proportion of major planning permissions including green infrastructure</li> <li>• Proportion of new greenways implemented</li> <li>• Increase in cycle use and implementation of proposed cycle routes</li> <li>• Number of electric vehicle charging points</li> </ul>
SA9 – Landscape and Townscape	<ul style="list-style-type: none"> <li>• The number of buildings on the Heritage at Risk Register</li> <li>• Proportion of new housing built on previously developed land</li> <li>• Amount of additional floorspace for town centre uses within local centres</li> </ul>	<ul style="list-style-type: none"> <li>• Amount of floorspace for town centre uses completed within the town centre boundary</li> <li>• Number of applications in accordance with Historic England’s advice</li> <li>• The number of buildings on the Heritage at Risk Register</li> <li>• Protection of listed and locally listed buildings</li> <li>• Proportion of applications adequately addressing the characterisation study</li> <li>• Number of schemes delivered that include public realm improvements</li> <li>• Proportion of major planning permissions including green infrastructure</li> <li>• Proportion of new greenways implemented</li> <li>• Implementation of public transport improvements</li> <li>• Number of major developments with SuDs</li> <li>•</li> </ul>
SA10 – Material Resources	<ul style="list-style-type: none"> <li>• Delivery of waste capacity requirements which includes targets for recycling and energy recovery</li> <li>• Safeguarding of key minerals infrastructure and the number of facilities that</li> </ul>	<ul style="list-style-type: none"> <li>• Number of proposals that needlessly sterilise mineral resources</li> </ul>

	sterilise mineral resources	
SA11 – Renewable and Low Carbon Energy	<ul style="list-style-type: none"> <li>• Delivery of waste capacity requirements</li> <li>• Delivery of waste capacity requirements which includes targets for recycling and energy recovery</li> </ul>	<ul style="list-style-type: none"> <li>• Proportion of major planning permissions including green infrastructure</li> <li>• Number of electric vehicle charging points</li> </ul>
SA12 – Soil Ground Conditions	<ul style="list-style-type: none"> <li>• Delivery of waste capacity requirements which includes targets for recycling and energy recovery</li> <li>• Proportion of new housing built on previously developed land</li> </ul>	<ul style="list-style-type: none"> <li>• Proportion of major planning permissions including green infrastructure</li> <li>• Planning permissions granted in accordance with Environmental Protection</li> </ul>
SA13 – Transport and Accessibility	<ul style="list-style-type: none"> <li>• Monitored through the 'Movement for Growth' monitoring indicators</li> <li>• Safeguarding of railway lines and delivery of schemes</li> <li>• Amount of additional floorspace for town centre uses within local centres</li> </ul>	<ul style="list-style-type: none"> <li>• Monitored through the 'Movement for Growth' monitoring indicators</li> <li>• Additional education, healthcare and community floorspace in the centre</li> <li>• Number of schemes delivered that include public realm improvements</li> <li>• Proportion of new greenways implemented</li> <li>• Increase in cycle use and implementation of proposed cycle routes</li> <li>• Implementation of public transport improvements</li> <li>• Highway improvements implemented</li> <li>• Number of car parking spaces</li> <li>• Number of electric vehicle charging points</li> </ul>

SA14 – Water Environment	<ul style="list-style-type: none"> <li>• Number of applications granted in accordance with the Environment Agency comments</li> </ul>	<ul style="list-style-type: none"> <li>• Number of applications granted in accordance with the Environment Agency comments</li> <li>• Proportion of major planning permissions including green infrastructure</li> <li>• Number of major developments with SuDs</li> </ul>
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## 10.2 Limitations of Monitoring

The resources available within the Council for monitoring the effects of local plans are limited. Chapter 4 above has outlined the difficulties encountered in gathering evidence for the SA and for plan preparation because of this. The Council is entirely reliant on its own staff resources to monitor the effects of the BCCS and UDP, which involves gathering the data sets needed to monitor these effects (for example, new planning permissions and developments implemented), collation of the information, and preparation of AMRs.

Monitoring also depends on the data available, and some effects cannot be monitored except at a site-specific level, through detailed arrangements that may have to be put into place as a condition of the planning permission (for example, monitoring of leachate and gas from landfill sites). Monitoring of some effects also relies on data sets produced by external organisations, which can be difficult to interrogate and interpret (see Chapter 4).

It likely that the resources available for monitoring within Walsall Council will be reduced in future, which may mean that difficult choices have to be made about what is monitored and what is not. It cannot be taken for granted that all of the data sets currently available will continue to be collected over the remainder of the plan period.

The monitoring indicators in the AAP will allow for a more holistic picture of the health of the centre to be developed. By having indicators that capture the delivery of schemes such as public transport, public realm and green infrastructure it is hoped that the Council will be able to fill some of its deficiencies in how healthy the town centre is overall. This will provide an update to the data we have the town centre which is formed mostly by evidence that has been commissioned on the town centre. This will also be a move away from the current monitoring which only really captures the amount of town centre floorspace that is delivered. Collating data on the environmental quality of the centre will allow for more information on how the AAP meets many of the SA objectives.

## Monitoring of Unforeseen Adverse Effects

It is important that the monitoring of the plans allows for any unforeseen adverse impacts to be monitored. The following uncertain effects have been identified.

### SAD

- It is not always possible to be certain of the levels of air pollution individual proposal will be exposed to in the future. Planning applications would consider the levels of air pollution and propose any mitigation necessary.
- Uncertain localised effects on the amenity of neighbouring land uses from noise, vehicle movements and depositing of waste through the development/retention of industry. Planning applications would consider the design of schemes to ensure there was no detrimental impact.
- Uncertain or possible adverse on visual amenity depending on the size and configuration of the industry. Planning applications would consider the design of schemes to ensure there was no detrimental impact.
- Some uncertainties about impacts on biodiversity/ wildlife habitats, as it is proposed to reallocate some lesser quality areas of Open Space for other land uses and it is possible that some of these could have ecological value. Effects on wildlife habitats would need to be evaluated and appropriate mitigation provided in accordance with existing policy, before development is approved.
- Effects on biodiversity and water quality are uncertain (SA2, SA14), as increased development and activity in canal corridors may have some impact, however, such impacts should in most cases be capable of being mitigated where effective maintenance arrangements are put into place as requirements of any planning permissions granted.
- A number of uncertainties have been identified on individual sites for waste and minerals schemes, such as where there are existing environmental problems or constraints which would have to be managed or mitigated if expansion was proposed, in particular, where sites are in areas of exceedance for NO<sub>2</sub>, are likely to have ground condition problems and/ or are at risk from flooding which could cause pollution of soils and groundwater. These are all issues that would need to be addressed through the planning application process.

None of the uncertain effects above have been identified as adverse; it is however possible that over time changes in air pollution could have adverse impacts. This is monitored by the Council and also through documents such as the 'Movement for Growth' strategic transport document. It would therefore be possible to ascertain if the plan is having a significant impact on air quality in the borough.



#### **AAP**

- The main uncertainties are where new development will take place within the Town Centre Boundary (although other policies of the AAP identify specific opportunities), and the exact combination of development and land uses provided. The extent of risks from existing environmental problems such as air pollution and flood risk is also uncertain as this depends on where development takes place. These effects would be considered as part of individual planning applications.

### **10.3 Significant Effects Indicators – SAD**

No further monitoring indicators have been identified, as the monitoring indicators identified in the SAD are considered to be sufficient to measure the environmental, economic and social effects of the plan, including any ‘significant’ harmful effects likely to arise. The potential ‘significant’ effects of SAD Policies M8 and M9 identified in the SA will be monitored through the following existing indicators:

- **EN1 (BCCS Indicator LOI ENV1)** – Net reduction in the area of designated nature conservation sites through development;
- **M7a (BCCS Indicators LOI MIN3 and LOI MIN5)** – Percentage of applications for brick clay extraction or restoration of former brick clay extraction sites which satisfy the general requirements and criteria in BCCS Policies MIN3 and MIN5 and the specific requirements in SAD Policies M7 and M8; and
- **M9a (BCCS Indicators LOI MIN4 and LOI MIN5)** – Percentage of applications for opencast coal and fireclay extraction (including applications for new conditions) which satisfy the general requirements and criteria in BCCS Policies MIN4 and MIN5 and specific requirements in SAD Policy M9.

### **10.4 Significant Effects Indicators – AAP**

No further monitoring indicators have been identified, as the monitoring indicators identified in the AAP are considered to be sufficient to measure the environmental, economic and social effects of the plan.

### **10.5 Mitigation in response to any significant adverse impacts**

Where potential harmful effects have been identified (including uncertain effects that could be harmful) which would not be addressed through application of existing national policy

guidance and local plan policy in the BCCS or UDP, they have been mitigated through the relevant SAD Policies, where feasible.

The **significant harmful effects of Policies M8 and M9** have been mitigated to the extent possible by identifying requirements for provision of supporting information with new or revised applications for mineral extraction. This will ensure that the effects of the development will be evaluated in more detail at the appropriate time, and that the measures proposed to prevent, manage and mitigate the effects on the environment, amenity and infrastructure will be assessed by the Council's Development Management Team, the Local Highway Authority and other infrastructure providers, and the relevant statutory consultation, to ensure that they are effective.

Similar requirements have been included in **Policies M4, M5 and M7** to control the harmful effects of further sand and gravel extraction in Aldridge and brick clay extraction at Stubbers Green, which will not necessarily be 'significant' and are not expected to be as harmful as implementing the 'dormant' permissions at Highfields North and Brownhills Common, or clay and coal extraction at Yorks Bridge. Otherwise, the effects of mineral extraction can be mitigated through the approved working programme and working conditions, and through environmental regulation, once development has been implemented. The conditions can establish the timescale for mineral extraction and restoration and the stages where updated working plans should be provided. Conditions can also require certain measures to be implemented to control the anticipated effects on the environment or amenity, and to require outstanding details of the development to be provided within a specified timescale.