

## 2. The Sustainability Appraisal Process

### 2.1 Sustainability Appraisal – the Council’s Approach

The SA of the SAD and AAP has been carried out by officers within the Council’s Planning Policy and Development and Delivery Teams. The same officers have also been responsible for preparing the plans themselves, including the Issues & Options Reports published in April 2013 and the Draft SAD and AAP and Preferred Options documents published in September 2015, and the final plans published in March 2016.

Other Council teams with specialist knowledge of particular issues have also been involved in the scoping of the SA and development of the SA framework. For example, the Council’s Natural & Built Environment Team have provided advice on biodiversity and landscape issues, the Pollution Control Team have provided advice on air quality, noise, land contamination and flood risk, and the Transportation Strategy and Transportation Forward Planning Teams who have provided advice on transport and accessibility issues. The Council has also retained consultants Ursus Consulting Ltd to provide guidance on the SA process, and to provide independent critical appraisal of the SA reports produced by the Council.

Table 2 below summarises the key stages of plan preparation and the corresponding stages of SA. This report summarises the outcomes of Stages 1 – 4 of the SA, up to the preparation of the final SAD and AAP for publication in January 2016. The SA has focused on assessing the ‘reasonable alternatives’ identified for each plan. Options which have been rejected because they are not realistic have not been included in the appraisal (see Chapter 6).

### 2.2 Sustainability Appraisal – Relationship to Other Assessments

It is a legal requirement to carry out a sustainability appraisal of all local plans such as the SAD and AAP.<sup>1</sup> It is also a requirement under separate legislation to carry out another type of assessment called a **Strategic Environmental Assessment (SEA)**.<sup>2</sup>

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<sup>1</sup> Section 19 of Planning and Compulsory Purchase Act 2004 (as amended)

<sup>2</sup> The “Environmental Assessment of Plans and Programmes Directive” (SEA Directive) 2001/42/EC which has been transposed into UK legislation through the Environmental Assessment of Plans and Programmes Regulations (SI 2004 No. 1633) (SEA Regulations)

**Table 2: Sustainability Appraisal of SAD and AAP – Key Stages**

<b>SAD and AAP Key Stages</b>	<b>SA Key Stages</b>	<b>SEA Key Stages</b>	<b>EqIA Key Stages</b>	<b>HIA Key Stages</b>
<b>1. Pre-Production</b>	<b>1: Scoping</b> 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
<b>2. Issues &amp; Options</b>	<b>2: Options Appraisal</b> 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
<b>3. Draft Plans (Preferred Options)</b>	<b>3: Appraisal of Preferred Options</b> 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
<b>4. Publication</b>	<b>4: Final Appraisal</b> 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
<b>5. Submission</b>	<b>5: Appraisal of Significant Changes (if required)</b>	Stage D2	Appraising impact of changes on equality	Appraising impact of changes on health
<b>6. Independent Examination</b>	<b>6. Independent Examination</b>	Stages B2 – D2 update as required	Revisit appraisal of effects on equality as required	Revisit appraisal of effects on health as required
<b>7. Inspector's Report</b>	<b>7. Review Inspector's Recommendations</b>	N/A	N/A	N/A
<b>8. Adoption</b>	<b>8: Adoption</b> 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
<b>9. Monitoring &amp; Implementation</b>	<b>9: Monitoring Significant Effects</b>	Stages E1 and E2	Monitoring of equality impacts	Monitoring of health impacts

Source: Table 3.2, Walsall SAD and AAP Revised SA Scoping Report (Version 2, May 2013)

It is the requirements for SEA that have dictated the SA of the SAD and AAP and the structure of this report, which includes all of the information that has to be included in a SEA 'environmental report' (see Schedule 2 of the SEA Regulations and Appendix P).

It is implicit in other legislation that the effects of local plans on equality should also be assessed,<sup>3</sup> and in Walsall there is also a commitment to assess the effects of new developments on health and wellbeing.<sup>4</sup> As well as incorporating the requirements of SEA, the SA Framework also includes criteria and indicators for **Equality Impact Assessment (EqIA)** and **Health Impact Assessment (HIA)**.

The requirements for SA, SEA, EqIA and HIA have been integrated into a single assessment framework, to avoid unnecessary duplication, given the overlaps in the range of issues that each type of assessment is expected to cover. Chapters 6 - 8 of the SA Report summarise the potential effects on the environment, equality and health identified at each key stage of the SA, and how potential harmful effects have been mitigated, and Appendix P summarises how the requirements of the SEA Regulations have been met within this report.

Another assessment, called the **Habitats Regulations Assessment (HRA)**, has been carried out in parallel with the SA, but separately. The HRA report has been published alongside this report. The HRA has considered the impacts of the SAD and AAP on sites of international importance for biodiversity. This type of assessment has to be done in a different way, so it cannot be combined with the SA, but the SA has taken account of it. For example, the Options identified for mitigating the potential effects of the SAD and AAP on European Sites have been appraised, and the effects identified have been reflected in the choice of Preferred Options and the SAD and AAP Policies (see Chapters 6 - 8).

The SA has also been carried out in parallel with other assessments of potential site allocation options, in particular, the Viability and Delivery Assessments commissioned from consultants, and the Council's evaluation of the potential environmental and physical constraints affecting these sites. The information obtained from these assessments has been fed into the SA process at each key stage.

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<sup>3</sup> Section 149 of the Equality Act 2010 (as amended) defines the Public Sector Equality Duty (PSED), and requires local authorities to publish information demonstrating their compliance with the duty – it is therefore implicit that they must monitor compliance with the duty when carrying out their key functions

<sup>4</sup> Priority 13, Walsall Health and Wellbeing Strategy (2014 Refresh), Walsall Health & Wellbeing Board

## 2.3 Sustainability Appraisal – Consultation and Engagement

### Public Consultation – Statutory Requirements

Under current planning legislation, certain bodies must be consulted on local plans and on the SA of local plans. The bodies that must be consulted are listed in Table 3 below. The paragraphs below explain the background to this requirement.

**Table 3: SA of Walsall SAD and AAP - Statutory Consultation Bodies**

Statutory Consultation Bodies	SEA Consultation Body?	DTC Consultation Body?
Environment Agency	Yes	Yes
Historic England	Yes	Yes
Natural England	Yes	Yes
Mayor of London	No	Yes*
Civil Aviation Authority (CAA)	No	Yes
Homes and Communities Agency (HCA)	No	Yes
Office of Rail Regulation	No	Yes
Clinical Commissioning Groups (CCGs)	No	Yes
Transport for London (TfL)	No	Yes <sup>1</sup>
Integrated Transport Authorities (ITAs)	No	Yes
Highway Authorities	No	Yes
Marine Management Organisation	No	Yes
Local Enterprise Partnerships (LEPs)	No	Yes
Other Planning Authorities	No	Yes

Source: SEA Regulations 2004 and Local Planning Regulations 2012 (as amended)

### Notes on Table 3:

1. Mayor of London has to be consulted in certain situations as defined in the regulations.

The SEA Regulations require the Council to consult the general public and certain 'consultation bodies' on SA Reports (Regulations 2, 4, 12 and 13). If there is potential for significant effects on the environment of another European Member State, the relevant Member State must also be consulted (Regulation 14). However, very few local plans are likely to have such effects. The available evidence has not identified any potential for the Walsall SAD and AAP to have any effects on other European countries, so no other European Member States have been consulted.

Current planning legislation<sup>5</sup> also requires the Council to consult the public and to engage with certain specified consultation bodies and with other planning authorities when preparing new local plans, under the 'duty to co-operate.' The 'strategic matters' on which planning authorities are required to 'co-operate' are:

- *"Sustainable development or use of land that has or would have a significant effect on at least two planning areas,"* including development in connection with strategic infrastructure; and
- *"County matters,"* which mostly relate to waste and mineral development.

The 'duty to co-operate' consultation bodies (DTC Consultation Bodies) also have to be consulted on SA reports, which are required to be published for public consultation alongside the emerging proposals for local plans.

### Consultation on the SAD and AAP

The preparation of the SAD and AAP has involves three main stages of consultation. In 2013 the Council consulted on the Issues and Options (I&O) for each plan. The Issues & Options Reports set out the issues that the plans needed to address, and possible solutions, including a range of different Options, including sites that the Council and other parties such

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<sup>5</sup> Section 33A of Planning and Compulsory Purchase Act 2004 as amended by Section 110 of the Localism Act 2011, also Town and Country Planning (Local Planning) (England) Regulations 2012 (SI 2012 ) (as amended)

as landowners and developers had identified as being potentially suitable for development. This was a wide reaching consultation with events being held at market stalls throughout the borough, a pop-up shop in the town centre for a week and attendance at various Council events and meetings. The Council received 194 responses on the SAD and 37 on the AAP. Further detail on how we encouraged people to get involved and the level of response is available in the Issue and Options Consultation Report<sup>6</sup>

The second stage of consultation was the Preferred Option (PO) stage which ran between 7<sup>th</sup> September and 2nd November 2015. The consultation documents identified specific sites, including those highlighted at the Issues and Options stage, and others identified since then, that the Council considered should be allocated for development, as well as assets that ought to be protected, and constraints that prevent or limit development in particular locations. Again the Council undertook a number of consultation events similar to those undertaken at Issues and Options. In addition to this we also undertook a number of area specific consultation events to address the concerns of local residents partially around the impact of Gypsy and Traveller sites.

There were approximately 1,200 written representations to the SAD at the PO stage. About 900 of these consisted of a standard letter objecting to the proposal for a traveller site in Bentley. There were around 20 official representations on the Town Centre Area Action Plan. We also had around 20 official representations to the proposed Community Infrastructure Levy consultation. In addition to formal written representations we received 3,526 names or signatures on petitions covering site specific Gypsy/ Traveller site proposals. A Preferred Option Consultation Report<sup>7</sup> has been produced which provides further information of the consultation undertaken.

At each stage the Council published a spreadsheet that provides details on how comments made during the consultation have influenced the plan making process.

This SA report covers the third stage call 'Publication'. The SAD and APP Draft Plans are the final version of the Document that we intend (subject to approval by the Council) to submit for examination by an inspector appointed by the Secretary of State. They incorporate changes made since the "Preferred Options" version and looks to address the

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<sup>6</sup> I&O Consultation Report can be viewed at:

[http://cms.walsall.gov.uk/index/environment/planning/planning\\_policy/local\\_plans/evidence.htm](http://cms.walsall.gov.uk/index/environment/planning/planning_policy/local_plans/evidence.htm)

<sup>7</sup> PO Consultation Report can be viewed at:

[http://cms.walsall.gov.uk/index/environment/planning/planning\\_policy/local\\_plans/evidence.htm](http://cms.walsall.gov.uk/index/environment/planning/planning_policy/local_plans/evidence.htm)

representations made by the public, statutory bodies and other organisations in response to the consultation that took place in autumn 2015. Again this is a 8 week consultation and a number of consultation will be arranged – details of which are available on our website.

## **Consultation on the SA**

In accordance with the regulations, the statutory bodies and the public were consulted on the first draft SA Scoping Report in 2011. The comments received during this consultation were reflected in the further development of the SA framework, as is explained in the Revised SA Scoping Report (v2 May 2013).

The revised SA Scoping Report and Options Appraisal Report were published for public consultation in April 2013 alongside the SAD and AAP Issues and Options documents. Outside of the formal consultation process, there has also been ongoing discussion and engagement between Council officers and the statutory environmental bodies on a wide range of environmental issues and on specific sites.

There has also been consultation on the appraisal of the Council's emerging 'Preferred Options' (i.e. the Draft Plans) in 2015. Although no SA report was published at this stage, the SA Matrices summarising the outcomes of appraisals were published alongside the Draft SAD and AAP and the Preferred Options consultation documents.

The Preferred Options documents (September 2015) provided further information on the background to the preparation of the draft plans, including the results of the SA up to that point, and how the outcomes of the appraisal has influenced the preparation of the Draft SAD and AAP policies and proposed site allocations identified in the Draft Plans.

Each of the Issues & Options and Preferred Options consultation documents also included a question about the SA in the Introduction Chapter. The publication of the SAD and AAP (March 2016) provides a further opportunity for the statutory environmental bodies and the public to comment on the approach towards SA and how the Council has justified the choices it has made in the final plans.

## **Public Consultation Responses**

The comments received at the SA scoping stage in 2011 were summarised in Appendix K of the Revised SA Scoping Report (May 2013). There was general support for the integrated approach towards appraisal of the plans. Several respondents suggested additional plans, policies and programmes or evidence for consideration, or changes to the SA Objectives, Criteria and Indicators, all of which were taken into account.

However, very few comments were received on the SA during the Issues & Options consultation in 2013 and the Preferred Options consultation in 2015. The comments received on the SA, other relevant plans, policies and programmes (PPPs) and the evidence base, and the Council's response to these comments, are summarised in Table 4 below.

## **Feedback from Council's SA Advisor**

The Council's SA advisor, Ursus Consulting Ltd, has provided feedback on the Options Appraisal carried out at the Issues & Options stage. The Consultant has produced a checklist of the key legal requirements for SA and SEA and has assessed the extent to which the Revised SA Scoping Report, Options Appraisal Report and Non-Technical Summary published in April/ May 2013 comply with these requirements.

As this is an integrated appraisal which has to address the requirements for SEA, the SA report must cover all of the requirements of a SEA environmental report, as outlined in Article 5 and Annex I of the SEA Directive. A number of significant omissions were identified in the Options Appraisal Report, which have now been rectified.

The feedback received from the Consultant is summarised in Table 5a below. The table also explains how the Council has addressed any significant omissions from the SA during the preparation of this report. Table 5b explains the references used.



**Table 4: SAD and AAP Public Consultation – Comments on the SA, Policy Context, Evidence Base and Council’s Response**

Respondent	Comments	Council Response
<b>Issues &amp; Options Consultation (April – June 2013)</b>		
English Heritage (Historic England) (812)	Should be clearly demonstrated that an adequate, up-to-date and relevant evidence base on the historic environment and heritage assets has been used to inform the AAP in accordance with the guidance in the NPPF (paragraphs 158, 169, 170). Recommend that AAP strategy and policies are informed by a detailed characterisation study for Walsall Town Centre.	The evidence base on the historic environment has been reviewed updated since the Issues & Options stage. The Council has also produced a Characterisation Study for Walsall Town Centre to inform the development of the AAP. The SA Framework includes Criteria and Indicators for assessing the impact of Options on improving the character, condition and management of conservation areas, and the conservation of historic buildings (see Criteria 6a and 6b).
Police and Crime Commissioner (1285)	Issues of crime and safety are fundamentally important and should be included within the core principles that underpin plan making and decision taking as required in the NPPF.	There is a limit to the extent that these issues can be addressed through land use plans such as the SAD and AAP. However, the Revised SA Framework (July 2015) includes Criteria and Indicators for assessing the impact of Options for the SAD and AAP on providing housing in safe and accessible locations, on increasing existing environmental risks and hazards, and on the effects of transport and traffic generation on health and safety (see Criteria 4d, 8b and 13c).

Respondent	Comments	Council Response
Cannock Chase District Council (2058)	The assessment should ensure cross-boundary issues are considered and addressed fully, particularly in relation to Cannock Chase SAC and Cannock Extension Canal SAC. Neighbouring local authority plans in the context of the abolition of the West Midlands RSS and the duty to cooperate should be referenced.	There have been ongoing discussions with Cannock Chase District Council and Staffordshire County Council on these issues following the Issues & Options consultation. The SA process will consider the potential for SAD and AAP Options to have effects on areas outside Walsall Borough. The 'duty to co-operate' with other planning authorities where there is potential for cross-boundary impacts has been referenced in Section 1.5 of the SA Report published alongside the Preferred Options for the SAD and AAP and emerging local plans of neighbouring authorities have been taken into account.
Mr P Hands (Resident) (1697)	An equalities assessment should be carried out in order to assess the impact on people with disabilities.	As is explained in Section 1 of the Revised SA Scoping Report (V2 May 2013) and Section 1.3 of the SA Report published alongside the Preferred Options for the SAD and AAP(September 2015), the SA is an integrated assessment which includes an equality impact assessment (EqIA). The SA Framework includes an objective for equality and diversity (SA Objective 7) and linked Criteria and Indicators, which will allow the impact of options for the SAD and AAP on people with 'protected characteristics,' including people with disabilities, to be assessed. SA Objective has been revised to more closely align with the requirements of the Equalities Act. The results of the EqIA element of the appraisal are summarised separately in this report.

Respondent	Comments	Council Response
<b>Preferred Options Consultation (September – November 2015)</b>		
Lichfield District Council (774)	Concerned that lack of Sustainability Assessment, Strategic Environmental Assessment and Habitats Impact Assessment mean it is not possible to assess impact on Cannock Chase SAC.	A SA has been carried out and a HRA is in progress. The SA has included an Options Appraisal and an Appraisal of the Draft SAD and AAP covering each Draft Policy, and has taken into account impacts on biodiversity and designated sites. The emerging results of the SA were summarised in the PO documents, and the SA Matrices setting out the detailed outcomes have been published on the Evidence page of the Council website. In accordance with the current local planning regulations, a SA Report and a HRA Report will be published alongside the final versions of the SAD and AAP at Publication stage.
Mr William Potter (Resident) (1800)	Where is sustainability appraisal?	A SA has been carried out. This has included an Options Appraisal and an Appraisal of the Draft SAD and AAP covering each Draft Policy. The emerging results of the SA were summarised in the PO documents, and the SA Matrices setting out the detailed outcomes have been published on the Evidence page of the Council website. In accordance with the current local planning regulations, a SA Report will be published alongside the final versions of the SAD and AAP at Publication stage.






Respondent	Comments	Council Response
Cannock Chase District Council (1812)	<p>The Sustainability Appraisal does not look at the Green Belt, stating that it would not be a reasonable alternative because the Black Country Core Strategy itself does not support development in the Green Belt. Whilst the principle of this is understood, the statement in blue text on Page 32 of the SAD should not draw the sweeping generalisation that <i>“Green Belt sites would generally have worse access to public transport and other services”</i>.</p>	<p>The SA has considered impacts on Green Belt, under SA Objective 9: Landscape and Townscape. Development in the Green Belt has been rejected as an Option as it is not considered to be a "reasonable alternative" for the SAD. Sufficient opportunities have been identified on previously-developed land and low grade open space within the urban areas, therefore, release of Green Belt land would be contrary to the Core Strategy "brownfield first" principle and the spatial strategy for the regeneration of the Black Country as well as the Council's aspirations for the regeneration of the borough. It would also be contrary to national policy guidance which encourages the effective use of land, advises that Green Belt boundaries should only be altered in "exceptional circumstances," and advises that land with lower environmental value should be allocated in local plans in preference to land with higher value where there is a choice (NPPF paragraphs 17, 83, 110 - 112). Furthermore, the outcomes of the Revised Options Appraisal have demonstrated that Housing and Industrial Land Options that include peripheral Green Belt sites perform very poorly against SA Objective 13: Transport and Accessibility (see SAD Revised Options Appraisal SA Matrix (2015) published on Evidence page of Council website).</p>

Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)




Respondent	Comments	Council Response
Natural England (2274)	<p>Council should have regard under the Habitats Regulations to the potential impact on the Cannock Extension Canal SAC. There is no indication that the SAD will be accompanied by a HRA.</p> <p>The SAD may require a Strategic Environmental Assessment.</p>	<p>An SA has been carried out which has incorporated the requirements of SEA. A HRA is also in progress and the outcomes of this will inform the SA. The emerging results of the SA were summarised in the PO documents, and the SA Matrices setting out the detailed outcomes have been published on the Evidence page of the Council website. In accordance with the current local planning regulations, a SA Report and a HRA Report will be published alongside the final versions of the SAD and AAP at Publication stage.</p>

Source: Responses to Walsall SAD & AAP Issues & Options Consultation, April – June 2013 and Preferred Options Consultation, September – November 2015

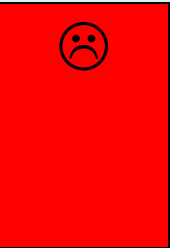
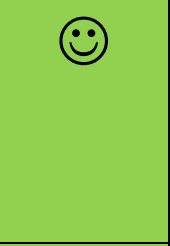
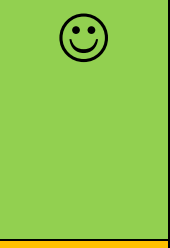
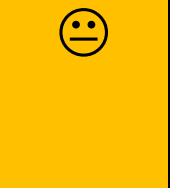
**Table 5a: Revised SA Scoping Report, Options Appraisal Report and Non-Technical Summary (NTS) (April/ May 2013) - Feedback from Ursus Consulting (May 2013) and Council Response**

Consultants' Quality Assurance Checklist Requirements	Evaluation Score	Consultants' Feedback	Council Response
<b>Objectives and context</b>			
The plan's purpose and Objectives are made clear.		The main report does not discuss the purpose of the SAD and AAP. Their objectives are listed in an appendix. An outline of the plan contents and main objectives is required by Annex I of the SEA Directive, and the report should contain a section that addresses this requirement	This is covered in the SA Report: Chapter 1 (1.2 – 1.4)
Sustainability issues including international and EC objectives, are considered in developing objectives and targets.		We know that the Scoping stage carried out an extensive review of Plans, Programmes and Policies (PPPs) at all levels, including international and EU, and were taken into account in developing the SA framework. However the Options Appraisal Report does not explain this. It is a requirement of the SEA Directive that the report provides information on relevant environmental protection objectives and explains how these have been taken into account therefore this information needs to be provided.	This is covered in the SA Report: Chapter 3 (3.1) Appendices Oi and Oii
SA objectives are clearly set out and linked to indicators and targets where appropriate.		SA objectives are set out in Appendix A of the report. Appendix 1of the NTS links the objectives to targets and indicators.	This is covered in the SA Report: Chapter 2 (2.4 - 2.5) Appendices A - D
Links with related other plans, programmes and policies are explained		The NTS discusses links to other related PPPs of relevance to the SAD and AAP.	This is covered in the SA Report: Chapter 3 (3.2 – 3.6) Appendices A – D, Oi & Oii
Conflicts that exist between SA objectives, between SA and plan		Conflicts between SA objectives and SAD and AAP objectives are identified and described in the main	This is covered in the SA Report: Chapter 2 (2.5)

Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

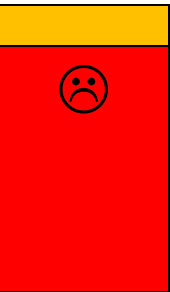

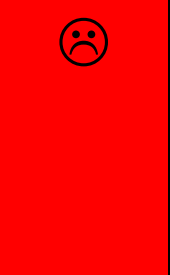
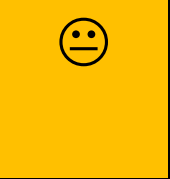
objectives, and between SA and other plan objectives are identified and described.		report. Internal conflicts between SA objectives are assessed in section 7.3 of the Scoping Report.	Chapter 5 (5.2 - 5.3) Appendix C Appendices F and G
<b>Scoping</b>			
The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the SA Report.		Consultation on the Scoping Report was carried out in line with requirements.	Summary of consultation is included in SA Report: Chapter 2 (2.3)
The appraisal focuses on significant issues.		The Scoping Report identified the key relevant sustainability issues for Walsall, and these are reflected in the SA Objectives.	Update of key sustainability issues (SA Topics) is included in SA Report: Chapter 2 (2.4) Appendix A
Technical, procedural, and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.		Section 5.4 of the draft Scoping Report discussed difficulties with data collection. No other technical or procedural difficulties appear to have been encountered, but the appraisal does indicate where assumptions have been made and uncertainties encountered. It is recommended that at subsequent stages of the appraisal work, more use is made of the opportunity to highlight difficulties in undertaking the appraisal so that the requirement of Annex I of the SEA Directive is certain to be met.	This is covered in the SA Report: Chapter 1 (1.5) Chapter 2 (2.6) Chapter 4 (4.2)
Reasons are given for eliminating issues from further consideration.		No issues have been eliminated from consideration at this stage.	This is covered in the SA Report: Chapter 1 (1.5) Chapter 6 (6.2 – 6.3) Appendices H and I Appendices L and M Appendix N Details provided in SA Matrices:

Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

			SAD SA – Revised SAD Options Appraisal (Jan 2016) AAP SA – Revised AAP Options Appraisal (Jan 2016)
<b>Options/ alternatives</b>			
Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.		The options for the SAD and AAP are addressed. However, no explanation is given of the reasons for choosing the options. The SEA Directive requires that the report gives an outline of the reasons for selecting the alternatives dealt with therefore the report should provide this information in line with this requirement.	This is covered in the SA Report: Chapter 6 (6.2 – 6.6) Appendices H and I Details provided in SA Matrices: SAD SA – Revised SAD Options Appraisal (Jan 2016) AAP SA – Revised AAP Options Appraisal (Jan 2016)
Alternatives include “do nothing” or “business as usual” scenarios.		Some groups of options include a “do nothing” scenario. Other groups of options have ruled out a “do nothing” option where this was not reasonable. This is explained in Appendices F and G of the main report.	This is covered in the SA Report: Chapter 6 (6.5 – 6.6) Appendices H and I Details provided in SA Matrices: SAD SA – Revised SAD Options Appraisal (Jan 2016) AAP SA – Revised AAP Options Appraisal (Jan 2016)
The sustainability effects (both adverse and beneficial) of each alternative are identified and compared.		The main report identifies the positive and negative sustainability effects of all the options.	This is covered in the SA Report: Chapter 6 (6.5 – 6.6) Appendices H and I Details provided in SA Matrices: SAD SA – Revised SAD Options Appraisal (Jan 2016) AAP SA – Revised AAP Options Appraisal (Jan 2016)
Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.		Inconsistencies between the alternatives and other relevant PPPs are identified in Appendices G and H. <sup>8</sup> Options are ruled out as a result of these inconsistencies.	This is covered in the SA Report: Chapter 6 (6.2 – 6.6) Appendices H, I, L and M Details provided in SA Matrices: SAD SA – Revised SAD Options Appraisal (Jan 2016)

<sup>8</sup> We assume this is an error and should have referred to Appendices F and G of the main Options Appraisal Report.





			AAP SA – Revised AAP Options Appraisal (Jan 2016)
Reasons are given for selection or elimination of alternatives.		Although Appendices G and H <sup>9</sup> explain why some options have been ruled out, no information is given about the selection of options. The SEA Directive requires that the report gives an outline of the reasons for selecting the alternatives dealt with, therefore the report should provide this information in line with this requirement.	This is covered in the SA Report: Chapter 6 (6.2 – 6.6) Appendices H, I, L and M Details provided in SA Matrices: SAD SA – Revised SAD Options Appraisal (Jan 2016) AAP SA – Revised AAP Options Appraisal (Jan 2016)
<b>Baseline Information</b>			
Relevant aspects of the current state of the environment and their likely evolution without the plan are described.		The NTS provides information on the current state of the environment and its likely evolution without the SAD and AAP. It is recommended that this information is put into the body of the main report and simply summarised in the NTS.	This is covered in the SA Report: Chapter 4 (4.3 – 4.4)
Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable.		The SEA Directive requires a description to be provided in the SA Report of the characteristics of areas likely to be significantly affected (see item (c) of Annex I). The NTS describes the potential effects on parts of the borough if the SAD and AAP were not prepared by the Council but the Directive requires a description of the areas likely to be significantly affected by the SAD and AAP rather than by their absence.	This is covered in the SA Report: Chapter 4 (4.5)
Difficulties such as deficiencies in information or methods are explained.		Section 5.4 of the Scoping Report discusses difficulties with data collection, but these are not reported in the Options Appraisal Report. If the lack of data led to difficulties in undertaking the appraisal, these should be described.	This is covered in the SA Report: Chapter 4 (4.2)
<b>Prediction and evaluation of likely “significant” effects</b>			

<sup>9</sup> We assume this is an error and should have referred to Appendices F and G of the main Options Appraisal Report.




Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

<p>Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, flora, fauna, soil, water, air, climate factors, material assets, cultural heritage and landscape) as being relevant.</p>		<p>The SA framework covers Directive issues and therefore Directive effects have been identified.</p>	<p>Covered in SA Report: Chapter 4 (4.5) Chapter 6 (6.5 – 6.6) Chapter 7 (7.3) Chapter 8 (8.3) Appendices H – K Appendix P Details provided in SA Matrices: SAD SA – Revised SAD Options Appraisal (Jan 2016) SAD SA - High Level Appraisal of SAD Policies SAD SA - Detailed Appraisal of SAD Policies M8 and M9 (Jan 2016) AAP SA – Revised AAP Options Appraisal (Jan 2016) AAP SA – High Level Appraisal of AAP Policies (Jan 2016)</p>
<p>Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed.</p>		<p>Appendices D and E show that the appraisal has assessed positive and negative effects, but there is no indication that the duration has been considered. The Scoping Report indicates that a more detailed appraisal of options will be carried out at the next stage of the process, including the duration of effects. This is an explicit requirement of Annex I of the SEA Directive and must be considered. Further assessment against this checklist item will be required at the next and subsequent stages.</p>	<p>Covered in SA Report: Chapter 4 (4.5) Chapter 6 (6.5 – 6.6) Chapter 7 (7.3) Chapter 8 (8.3) Appendices H – K Appendix P Details provided in SA Matrices: SAD SA – Revised SAD Options Appraisal (Jan 2016) SAD SA - High Level Appraisal of SAD Policies SAD SA - Detailed Appraisal of SAD Policies M8 and M9 (Jan 2016) AAP SA – Revised AAP Options Appraisal (Jan 2016)</p>

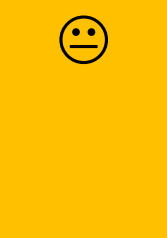
Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

			AAP SA – High Level Appraisal of AAP Policies (Jan 2016)
Likely secondary, cumulative and synergistic effects are identified where practicable.		Paragraph 3.4.4 of the Scoping Report indicates that secondary, cumulative and synergistic effects will be considered at the next stage of the process, but they have not been considered at the Issues & Options stage. This is an explicit requirement of Annex I of the SEA Directive and must be considered. Further assessment against this checklist item will be required at the next and subsequent stages.	<p>Covered in SA Report:</p> <p>Chapter 4 (4.5)</p> <p>Chapter 6 (6.5 – 6.6)</p> <p>Chapter 7 (7.3)</p> <p>Chapter 8 (8.3)</p> <p>Appendices H – K</p> <p>Appendix P</p> <p>Details provided in SA Matrices:</p> <p>SAD SA – Revised SAD Options Appraisal (Jan 2016)</p> <p>SAD SA - High Level Appraisal of SAD Policies</p> <p>SAD SA - Detailed Appraisal of SAD Policies M8 and M9 (Jan 2016)</p> <p>AAP SA – Revised AAP Options Appraisal (Jan 2016)</p> <p>AAP SA – High Level Appraisal of AAP Policies (Jan 2016)</p>
Inter-relationships between effects are considered where practicable.		Paragraph 3.4.4 of the Scoping Report indicates that inter-relationships between effects will be considered at the next stage of the process, but they have not been considered at the Issues & Options stage. This is an explicit requirement of Annex I of the SEA Directive and must be considered. Further assessment against this checklist item will be required at the next and subsequent stages.	<p>Covered in SA Report:</p> <p>Chapter 6 (6.5 – 6.6)</p> <p>Chapter 7 (7.3)</p> <p>Chapter 8 (7.4)</p> <p>Appendices H – K</p> <p>Appendix P</p> <p>Details provided in SA Matrices:</p> <p>SAD SA – Revised SAD Options Appraisal (Jan 2016)</p> <p>SAD SA - High Level Appraisal of SAD Policies</p> <p>SAD SA - Detailed Appraisal of SAD Policies M8 and M9 (Jan 2016)</p>







Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

			AAP SA – Revised AAP Options Appraisal (Jan 2016) AAP SA – High Level Appraisal of AAP Policies (Jan 2016)
Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations and thresholds.		There is little indication that the appraisal has made use of standards, regulations or thresholds. The Options Appraisal Report only makes a small number of references to air quality limits being exceeded in parts of the borough. It is likely that at this stage there is insufficient detail available on the options to make any practical use of such information, but it is recommended that in later stages when more detailed appraisal is possible that the Council gives consideration to the possibility of making use of standards, regulations and thresholds in the assessment of effects.	Covered in SA Report: Chapter 4 (4.5) Chapter 6 (6.5 – 6.6) Chapter 7 (7.3) Chapter 8 (8.3) Appendices H – K Appendix P Details provided in SA Matrices: SAD SA – Revised SAD Options Appraisal (Jan 2016) SAD SA - High Level Appraisal of SAD Policies SAD SA - Detailed Appraisal of SAD Policies M8 and M9 (Jan 2016) AAP SA – Revised AAP Options Appraisal (Jan 2016) AAP SA – High Level Appraisal of AAP Policies (Jan 2016)
Methods used to evaluate the effects are described.		Assessment methods have not been described. The SEA Directive explicitly requires the report to give a description of how the assessment was undertaken therefore this will need to be provided.	Covered in SA Report: Chapter 2 (2.6) Chapter 6 (6.5) Chapter 7 (7.2 – 7.3) Chapter 8 (8.2 – 7.3)
<b>Mitigation measures</b>			
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated.		Mitigation recommendations have been indicated as a result of the appraisal of Objectives and Options.	Covered in SA Report: Chapter 6 (6.5 – 6.6) Chapter 7 (7.3)


Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

			<p>Chapter 8 (8.3) Appendices H – K Details provided in SA Matrices: SAD SA – Revised SAD Options Appraisal (Jan 2016) SAD SA - High Level Appraisal of SAD Policies SAD SA - Detailed Appraisal of SAD Policies M8 and M9 (Jan 2016) AAP SA – Revised AAP Options Appraisal (Jan 2016) AAP SA – High Level Appraisal of AAP Policies (Jan 2016)</p>
Issues to be taken into account in development consents are identified.		Not relevant at this stage.	<p>Covered in SA Report: Chapter 7 (7.3) Chapter 8 (8.3) Appendices J – K Details provided in SA Matrices: SAD SA - High Level Appraisal of SAD Policies SAD SA - Detailed Appraisal of SAD Policies M8 and M9 (Jan 2016) AAP SA – High Level Appraisal of AAP Policies (Jan 2016)</p>
<b><i>The Sustainability Appraisal Report</i></b>			
Is clear and concise in its layout and presentation.		The Options Appraisal Report is clear and concise in its layout and presentation, although the NTS is rather long.	It is as concise as possible given the range of issues it is required to address and the constraints to development in Walsall / the complexity of the potential effects. The Non Technical Summary provides a shorter summary of the headline issues identified in the SA and how potentially harmful effects have been addressed in the SAD and AAP.


Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

Uses simple, clear language and avoids or explains technical terms.		Yes.	This has been addressed throughout the SA Report and in the Non Technical Summary.
Uses maps and other illustrations where appropriate.		No maps or illustrations are used. These would be particularly relevant to the baseline data and could be used to help give spatial specificity to the baseline.	Covered in SA Report: Chapter 1 (Figures 1 - 4) Chapter 3 (Figures 5 – 9) Chapter 4 (Figures 10 – 26)
Explains the methodology used.		The methodology is not explained. The SEA Directive explicitly requires the report to give a description of how the assessment was undertaken, therefore this will need to be provided.	Covered in SA Report: Chapter 2 (2.6) Chapter 6 (6.5) Chapter 7 (7.2) Chapter 8 (8.2) Appendix E
Explains who was consulted and what methods of consultation were used.		The NTS describes how the Options Appraisal Report and NTS were made available to the public.	Covered in SA Report: Chapter 2 (2.3)
Identifies sources of information, including expert judgement and matters of opinion.		The Options Appraisal Report does not identify sources of information. Although not explicitly required by the legislation, this is good practice for demonstrating how the conclusions of the appraisal have been reached. Sources of information should be indicated in future iterations of the SA Report.	Covered in SA Report: Chapter 4 (4.2)
Contains a non-technical summary		A NTS has been produced, but this is not physically contained within the Options Appraisal Report. Although the Options Appraisal is quite long, it does contain summaries of all the information required by Annex I of the SEA Directive. The following summary information is missing: <ul style="list-style-type: none"> <li>• An outline of the plan contents and main objectives</li> <li>• Characteristics of areas likely to be significantly</li> </ul>	A Non Technical Summary has been included at the beginning of the SA Report.

Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

		<p>affected by the SAD and AAP</p> <ul style="list-style-type: none"> <li>• Environmental protection objectives from review of PPPs</li> <li>• Mitigation recommendations</li> <li>• Reasons for selecting alternatives dealt with</li> <li>• Description of how the assessment was undertaken</li> <li>• Difficulties encountered</li> </ul> <p>In addition, the NTS contains only one reference to problems at a SAC. It is recommended that any screening information available from the Habitats Regulations Assessment is incorporated into the SA Report and NTS.</p> <p>The NTS also contains information that should be provided within the main body of the report, but is absent from the latter:</p> <ul style="list-style-type: none"> <li>• Relationship with other plans, policies and programmes</li> <li>• Relevant aspects of the current state of the environment and their likely evolution without the SAD and AAP.</li> </ul> <p>It is recommended that in future iterations of the SA Report, the Report is restructured to bring the NTS within the main report. It is also recommended that the NTS is shortened to provide more summarised information under the headings of Annex I of the SEA Directive, while the longer information it currently contains is moved to the main body of the SA Report.</p>	
<b>Consultation</b>			
The SA is consulted on as an integral part of the plan-making process.		Yes, this has been achieved to date.	Covered in SA Report:

Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

			Chapter 2 (2.6)
The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and SA Report.		Yes, this has been achieved to date.	Covered in SA Report: Chapter 2 (2.6)
<b><i>Decision-making and information on the decision</i></b>			
The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan.		Not relevant at this stage.	Covered in SA Report: Chapter 2 (2.6) Chapter 7 (7.3) Chapter 8 (8.3) Appendices J – K Details provided in SA Matrices: SAD SA - High Level Appraisal of SAD Policies SAD SA - Detailed Appraisal of SAD Policies M8 and M9 (Jan 2016) AAP SA – High Level Appraisal of AAP Policies (Jan 2016)
An explanation is given of how they have been taken into account.		Not relevant at this stage.	Covered in SA Report: Chapter 2 (2.6) Chapter 7 (7.3) Chapter 8 (8.3) Appendices J – K Details provided in SA Matrices: SAD SA - High Level Appraisal of SAD Policies SAD SA - Detailed Appraisal of SAD Policies M8 and M9






Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

			(Jan 2016) AAP SA – High Level Appraisal of AAP Policies (Jan 2016)
Reasons are given for choices in the adopted plan, in the light of other reasonable options considered.		Not relevant at this stage.	Covered in SA Report: Chapter 6 (6.2 – 6.6) Chapter 7 (7.1 – 7.2) Chapter 8 (8.1 - 8.2) Appendices H – I Details provided in SA Matrices: SAD SA – Revised SAD Options Appraisal (Jan 2016) AAP SA – Revised AAP Options Appraisal (Jan 2016)
<b>Monitoring</b>			
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SA.		Not relevant at this stage.	Covered in SA Report: Chapter 9
Monitoring is used, where appropriate, during implementation of the plan to make good deficiencies in baseline information in the SA.		Not relevant at this stage.	Covered in SA Report: Chapter 9
Monitoring enables unforeseen adverse effects to be identified at an early stage (these effects may include predictions which prove to be incorrect).		Not relevant at this stage.	Covered in SA Report: Chapter 9
Proposals are made for action in response to significant adverse effects.		Not relevant at this stage.	Covered in SA Report: Chapter 9

Source: Walsall Council Review of Sustainability Appraisal of Site Allocations DPD and Town Centre Area Action Plan at Issues and Options Stage: First Interim Report (31 May 2013), Ursus Consulting Ltd

**Table 5b: Explanation of References Used in Table 4a and Evaluation Scores**

<b>References</b>	
Appendices D and E	Appendices D and E of the main Options Appraisal Report (April 2013) which summarise the appraisal of Options for the SAD and AAP.
Appendices F and G/ Appendices G and H	Appendices F and G of the main Options Appraisal Report (April 2013) which list Options identified for the SAD and AAP that have been ruled out by the Council because they are not considered “reasonable” alternatives. N.B. Some of the references to “Appendices G and H” are assumed to be in error and to refer to Appendices F and G, as there is no Appendix H.
Main Report	Options Appraisal Report (April 2013)
NTS	Non-Technical Summary (April 2013) – this was published as a separate document
Scoping Report	Revised SA Scoping Report (V2 May 2013)
<b>Evaluation Scores – Meaning</b>	
	The SA is likely to meet the requirements and is of an acceptable standard for the checklist item. No further work is necessary.
	The SA is not likely to fully meet good practice standards in every respect of the checklist item, but there are no significant omissions and no issues of legislative compliance. Further work could be undertaken but is not essential.
	The SA is unlikely to sufficiently meet the requirements of the checklist item and may risk non-compliance with the SEA Directive if not remedied. Further work must be undertaken to meet the required standards.

## **2.4 Development of the Sustainability Appraisal Framework**

### **Scoping of the Appraisal**

The first stage in the SA process was ‘scoping’ – deciding the range of issues the appraisal would cover and the level of detail it would go into, and developing the Sustainability Appraisal Framework (SA Framework). The Council published a Revised SA Scoping Report in May 2013.<sup>10</sup> This report explained how the appraisal would be carried out and outlined:

- The approach towards sustainability appraisal, the framework to be used to appraise the effects of the SAD and AAP and the methods of assessment (Chapter 3);
- The existing policy context and relationship of the SAD and AAP to existing plans and programmes, and of the main sustainability objectives of the existing plans and programmes (Chapters 2 and 4 and Appendix D);
- Existing environmental, economic and social conditions, including existing problems, how conditions are likely to develop without the SAD and AAP, and the areas likely to be affected by the SAD and AAP (Chapters 5 and 6 and Appendix E); and
- How the framework for the appraisal was developed, having regard to the objectives of existing plans and programmes and the evidence of existing conditions (Chapter 7 and Appendix G).

### **Review and Updating of SA Framework – July 2015**

The Sustainability Appraisal Framework (SA Framework) which has been used to carry out the appraisal of the SAD and AAP is structured around 14 Sustainability Appraisal Objectives (SA Objectives). These are based on the main environmental, economic and social objectives

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<sup>10</sup> See: Integrated Sustainability Appraisal (SA) of the Walsall Site Allocations Development Plan Document (SAD) and Walsall Town Centre Area Action Plan (AAP): SA Stage 1: Revised SA Scoping Report Main Report and Appendices (May 2013), Walsall Council

identified in national planning policy guidance and existing plans and programmes for Walsall, the Black Country, and the wider West Midlands. The evidence gathered to inform the preparation of the plans shows that all of these topics are relevant to Walsall Borough, and therefore could be affected by the SAD and AAP.

For each SA Objective the Council has identified Criteria and Indicators to guide the appraisal process. The purpose of these was to help the assessors to decide what effects the SAD and AAP, in combination with existing plans and programmes, are likely to have on the achievement of the SA Objectives. For example, the types of effects they are likely to have, how long the effects would last, and whether the effects would be positive or negative. The Objectives, Criteria and Indicators that make up the framework have to requirements of the SEA Directive, other existing policy objectives (see Chapter 3) and the baseline evidence on environmental, social and economic conditions in Walsall (see Chapter 4).

As the preparation of the Preferred Options for the SAD and AAP has taken longer than expected, the SA scoping information gathered between 2011 and 2013 has been reviewed and updated to take account of the following:

- Comments and feedback received during the Issues & Options consultation, including feedback received from Ursus Consulting on the previous stages of SA;
- Significant changes to relevant plans and programmes and policy objectives for sustainability since the preparation of the Revised SA Scoping Report in 2013, including the publication of the National Planning Policy for Waste and new National Policy Statements; and
- Significant changes to the 'baseline' evidence for the SAD and AAP since the preparation of the Revised SA Scoping Report in 2013, including evidence from the latest monitoring reports and recent studies into the viability and delivery of development in Walsall, commissioned by the Council.

The following sections explain the how the SA scoping information and SA Framework have been updated to reflect the above.

## Review of SA Topics

The first step in the updating of the SA Framework was a review of the 14 SA Topics identified at the Scoping stage, which reflect existing policy objectives for sustainability and evidence on current baseline conditions (see Chapters 3 and 4 for further details). Table 5 below summarises the SA Topics identified, the aspects of the environment identified in the SEA Directive (= SEA Topics) that relate to each SA Topic, and the potential effects of the SAD and AAP that the SA will need to identify and evaluate.

Following the consultation on the Issues & Options, further consideration was given to adding a SA Topic on Noise. However, this was still felt to be inappropriate, because noise is an environmental problem rather than being an aspect of the environment in its own right. The SA Framework has been designed to identify potential harmful environmental, social and economic effects from noise, and development options that could generate potentially harmful levels of noise that may affect the environment and/ or local communities.

During the review and updating of the SA scoping information it became apparent that some relationships between SA Objectives and the aspects of the environment identified in the SEA Directive (SEA Topics) had not been identified at the initial SA Scoping stage. The Council has identified further potential relationships and effects of the SAD and AAP, which are identified in Table 6 below. The reasons for updating the information on SEA Topics are explained further in **Appendix A** of this report.

## Review of SA Objectives

The SA Objectives were revised in 2015 following a review and updating of relevant plans and programmes which identified some areas of conflict between the original SA Objectives and objectives for sustainable development outlined in current national planning policy guidance (see Chapter 3 for details). The Revised SA Objectives are set out in **Appendix B** of this report. The revisions are clearly indicated in the Appendix, and the reasons for the revisions to each SA Objective are explained.

**Table 6: SA and SEA Topics and Potential Effects of SAD and AAP (July 2015)**

SA Topics		Related SEA Topics	Potential Effects of SAD and AAP
1	<b>Air Quality</b>	Air Climatic Factors Human Health Material Assets	Development that could increase air pollution or cause “sensitive receptors” to be exposed to harmful levels of <b>air pollution, for example, development that could generate air pollution or significantly increase road traffic emissions, development proposed in</b> areas where the statutory limit values for pollutants identified in European and UK legislation are already being breached, for example, Nitrogen Dioxide (NO <sub>2</sub> ) Areas of Exceedance.
2	<b>Biodiversity &amp; Geodiversity</b>	Air Biodiversity Flora Fauna Landscape Water	Direct or indirect effects on biodiversity and geological conservation, such as development proposed on or near to designated sites, on other important wildlife habitats (e.g. BAP habitats) and protected species, development that could sever existing linkages between sites, such as wildlife corridors, or could help to improve linkages between sites.
3	<b>Climate Change</b>	Air Climatic Factors Material Assets Water	Effects on climate change mitigation and adaptation, such as development that could increase greenhouse gas emissions (in particular, CO <sub>2</sub> ), development that could increase vulnerability to unavoidable effects (e.g. flood risk, “heat island” effects), development that could include adaptation measures, particularly where this would increase resilience of existing development and infrastructure as well as planned development.
4	<b>Communities &amp; Population</b>	Human Health Material Assets Population	Effects on development of sustainable communities, such as development that could affect the overall quality and amenity of residential areas, affect delivery of housing requirements, or affect the ability of local people to access the services and facilities they need by a choice of transport modes, and development proposed in areas affected by high levels of social deprivation.
5	<b>Cultural Heritage</b>	Cultural Heritage, including architectural and archaeological heritage Landscape	Effects on the historic environment, such as development proposed on or near to heritage assets, including listed buildings, buildings and structures on the “local list,” conservation areas, registered parks and gardens, other historic landscapes, and sites identified on the Wolverhampton & Walsall HER.

Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

SA Topics		Related SEA Topics	Potential Effects of SAD and AAP
6	<b>Economy &amp; Centres</b>	Material Assets Population	Effects on economic sustainability, such as development that may affect existing businesses, jobs and employment land, development that may affect future investment, development that may affect access to jobs and training and development affecting transport infrastructure or other infrastructure needed to support and sustain economic growth.
7.	<b>Equality &amp; Diversity</b>	Human Health Material Assets Population	Effects on equality and diversity, such as development that may directly or indirectly discriminate against or have disproportionate harmful effects on people with “protected characteristics” (= age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or faith, sex, sexual orientation), or may affect integration and community cohesion.
8.	<b>Health &amp; Wellbeing</b>	Air Human Health Landscape Material Assets Population Soil Water	Effects on physical and mental health and well-being, such as development that could affect the quality of the environment, particularly in residential areas, development that may increase risks from existing hazards, development on or near to open space which could encourage or reduce access to walking, cycling, and outdoor sport and recreation, and development that may affect access to health and social care facilities.
9.	<b>Landscape &amp; Townscape</b>	Cultural Heritage, including architectural and archaeological heritage, Fauna Flora Landscape Material Assets Soil Water	Effects on landscape and townscape, such as development proposed in areas of local landscape and townscape value (e.g. Green Belt, conservation areas), development in prominent locations which could affect visual amenity, local character and sense of place.

Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

SA Topics		Related SEA Topics	Potential Effects of SAD and AAP
10.	<b>Material Resources</b>	Climatic Factors Human Health Material Assets Soil Water	Effects on material resources, for example, waste and minerals, such as development that may sterilise mineral resources of “local and national importance, “ development that may affect existing waste management infrastructure or mineral production facilities, and development that may generate significant amounts of waste that will require management.
11.	<b>Renewable &amp; Low Carbon Energy</b>	Climatic Factors Material Assets Population	Effects on energy consumption and production, such as development that will help to deliver new renewable energy generating infrastructure or may contribute towards “district “heating and cooling networks or otherwise help reduce reliance on non-renewable, carbon based energy sources, development that may help to improve security of supply and address fuel poverty.
12.	<b>Soil &amp; Ground Conditions</b>	Human Health Landscape Material Assets Soil Water	Effects on the quality and condition of land and soils, such as development proposed on or near to the “best and most versatile agricultural land” or which could affect the viability of agricultural businesses, development that could create or increase dereliction, development in areas affected by industrial and mining “legacy” where risks from ground instability or contamination need to be addressed.
13.	<b>Transport &amp; Accessibility</b>	Air Climatic Factors Human Health Material Assets Population	Effects on transport and accessibility, such as development in locations where there is significant pressure on existing transport infrastructure, development in locations where there is potential to reduce the need to travel and the effects of transport on the environment and health (e.g. from emission of pollutants, noise), development that will encourage people to make smarter and healthier transport choices and improve access to key jobs and services.



Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

SA Topics		Related SEA Topics	Potential Effects of SAD and AAP
14.	Water Environment	Climatic Factors Human Health Material Assets Soil Water	Effects on <b>water resources, quality and management and flood risk</b> , such as development in areas at risk from fluvial or surface water flooding, development that could affect water resources or water quality (e.g. from pollution), and development in locations where there is pressure on existing water or sewage treatment infrastructure meaning that improvement or upgrading of will be needed.

Source: SA Report – Appendices (February 2016), Appendix A

## Revised SA Objectives – Compatibility Testing

The Council has tested the Revised SA Objectives against each other to check for potential areas of tension or incompatibility. The methodology used for testing the Objectives was similar to that used for the Objectives Testing in 2013.

The outcome was positive overall, as the SA Objectives were found to be generally compatible with each other, and in some cases there was a high degree of compatibility between them. However, even with the revisions, some areas of conflict remain which it is unlikely to be possible to resolve. Table 7 below summarises the main areas of conflict between the Revised SA Objectives. The full results of the Revised SA Objectives Testing are presented in **Appendix C** of this report.

**Table 7: Revised SA Objectives (July 2015) – Summary of Conflicting Objectives**

SA Objectives	Conflicting SA Objectives	Reasons for Conflict
<b>SA2: Biodiversity &amp; Geodiversity</b>	SA10: Material Resources	Even with revisions to SA Objective 10, there are tensions that it is unlikely to be possible to remove completely, as SA Objective 2 includes avoiding development that would cause further loss, harm or deterioration of designated sites, which could compromise SA Objective 10 to address identified mineral supply requirements.
<b>SA9: Landscape &amp; Townscape</b>	SA10: Material Resources	Even with revisions to SA Objective 10, there are tensions that it is unlikely to be possible to remove completely, as SA Objective 9 includes protecting valued areas of landscape and townscape, which includes areas of open land containing significant mineral resources - rigid application of SA Objective 9 would therefore compromise SA Objective 10 to address identified mineral supply requirements.
<b>SA10: Material Resources</b>	SA2: Biodiversity & Geodiversity SA9: Landscape & Townscape SA12: Soil & Ground Conditions	Harmful effects of mineral development on other environmental assets can be controlled to an extent and in the long-term can be mitigated through restoration. However, some loss, harm or deterioration of sites important for biodiversity and local landscape character, and temporary dereliction of affected land, would be unavoidable, meaning there is conflict between this SA Objective and SA Objectives SA Objectives 2, 9 and 12.

SA Objectives	Conflicting SA Objectives	Reasons for Conflict
SA12: Soil & Ground Conditions	SA10: Material Resources	There is also conflict between SA Objective 12, which does not support development that would create further geotechnical problems, and SA Objective 10, which supports mineral extraction, as the latter would inevitably create more derelict land even though it would be temporary, assuming that the affected sites would eventually be restored.

Source: Walsall SAD & AAP SA Report Appendices (February 2016), Appendix C.

## Revised SA Indicators, Criteria and Targets

The Criteria and Indicators to be used in the SA have also been revised in the light of the review and updating of the 'baseline evidence' for the sustainability appraisal in 2015 (see Chapter 4 for further details). The Revised SA Criteria and Indicators are set out in **Appendix D** of this report, and a summary is provided in Table 8 below. The revisions are clearly indicated in the Appendix, and the reasons for the revisions to the Criteria and Indicators are also explained.

### 2.5 Revised SA Framework - July 2015

Table 8 below summarises the Revised SA Framework which has resulted from the updating of the SA Objectives, Criteria and Indicators in July 2015 described above. The complete SA Framework, with detailed SA Criteria, Indicators and Targets linked to each SA Objective can be found in **Appendix E** of this report. The purpose of the Revised SA Framework is to provide guidance to the assessors on the key issues to be taken into account in the appraisal of the SAD and AAP Options and the Draft SAD and AAP Policies.

**Table 8: Revised SA Framework (July 2015) – Summary of Revised SA Objectives, Criteria and Indicators**

SA Topics	Relevant SEA Topics	Revised SA Objectives	Revised SA Criteria and Indicators
<b>1: Air Quality</b>	Air Climatic Factors Human Health Material Assets	Reduce 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 <sub>2</sub> ) are not being met and/ or that there are high levels of other potentially harmful air pollutants	<ul style="list-style-type: none"> <li>• Are options likely to generate significant levels of NO<sub>2</sub> into the atmosphere?</li> <li>• Are options likely to generate significant amounts of other pollutants?</li> <li>• Do options involve uses likely to be harmed by exposure to high levels of NO<sub>2</sub> (e.g. in areas where limit values are already exceeded) or other harmful pollutants (such as other oxides of nitrogen and particulate matter)?</li> </ul>
<b>2: Biodiversity &amp; Geodiversity</b>	Air Biodiversity Flora Fauna Landscape Water	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 or other important wildlife habitats and geological features, or compromise existing ecological networks	<ul style="list-style-type: none"> <li>• How will options affect protected species?</li> <li>• How will options affect European Sites and other sites designated for their national or local importance for biodiversity or geodiversity?</li> <li>• How will options affect other important wildlife habitats such as priority habitats identified in the BAP, or geological features?</li> <li>• How will options affect existing ecological networks or contribute towards the development of the BCCS "environmental infrastructure network," such as the inclusion and protection inclusion of natural greenspace?</li> </ul>
<b>3: Climate Change</b>	Air Climatic Factors Material Assets Water	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 <sub>2</sub> ), and by identifying opportunities to mitigate the anticipated effects on key infrastructure and other important assets	<ul style="list-style-type: none"> <li>• Are options likely to generate significant levels of CO<sub>2</sub> or other "greenhouse gases"?</li> <li>• How will options impact on vulnerability of existing or proposed infrastructure and development to the unavoidable effects of climate change?</li> <li>• How will options contribute towards the BCCS "environmental infrastructure network," such as inclusion of environmental assets likely to improve resilience to climate change effects?</li> </ul>

Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

SA Topics	Relevant SEA Topics	Revised SA Objectives	Revised SA Criteria and Indicators
<b>4: Communities &amp; Population</b>	Human Health Population Material Assets	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	<ul style="list-style-type: none"> <li>• Does the quantity and quality of housing meet identified needs?</li> <li>• How will options affect the amenity, quality of life and wellbeing of existing local communities?</li> <li>• Are options likely to help reduce poverty and deprivation affecting the western and central parts of the Borough?</li> <li>• Will options help to deliver housing in locations that meet BCCS and UDP standards for accessibility to jobs, shops, open spaces and other essential social infrastructure?</li> </ul>
<b>5: Cultural Heritage</b>	Cultural Heritage, including architectural and archaeological heritage Landscape	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	<ul style="list-style-type: none"> <li>• Are options likely to enhance and/ or encourage better management of conservation areas, particularly those areas on the "at risk" register?</li> <li>• Are options likely to help conserve buildings of architectural or historic interest, including Great Barr Hall which is "at risk," and other vacant/ derelict historic buildings (e.g. Highgate Brewery), by identifying appropriate and viable new uses for them?</li> <li>• Are options likely to encourage appropriate management of historic parks and gardens, including Great Barr Park which is "at risk"?</li> <li>• How will options affect archaeological sites/ remains, including Scheduled Monuments and other sites identified on the Wolverhampton and Walsall HER?</li> <li>• How will options contribute towards the BCCS "environmental infrastructure network," such as the inclusion and protection of important heritage assets and their settings?</li> </ul>

Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

SA Topics	Relevant SEA Topics	Revised SA Objectives	Revised SA Criteria and Indicators
<b>6: Economy &amp; Centres</b>	Population Material Assets	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	<ul style="list-style-type: none"> <li>• How will options support business growth, investment and job retention or creation within the Borough, particularly in sectors not currently well represented?</li> <li>• How will options improve access to education and vocational training for the local workforce, particularly young people?</li> <li>• How will options affect BCCS requirements for provision of readily available employment land suitable for development with B1b, B1c, B2 and B8 uses, or help deliver the infrastructure needed to support industrial development and economic growth in Walsall Borough?</li> <li>• How will options impact directly on the environment and on the amenity, health and well-being of local communities from air pollution, noise and other potential nuisances?</li> <li>• How will options help local businesses to diversify and move towards a sustainable, low carbon economy?</li> <li>• How will options support the delivery and retention of "town centre" uses of an appropriate type and scale in the <u>Town</u> Centre and Local Centres, including the delivery of the BCCS requirements for new comparison shopping and office floorspace in the Town Centre?</li> </ul>
<b>7: Equality &amp; Diversity</b>	Human Health Population Material Assets	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	<ul style="list-style-type: none"> <li>• Are options likely to have different impacts on people with "protected characteristics," compared to people in general?</li> <li>• How will options help to deliver the BCCS requirements for sites for gypsies, travellers and travelling show people, and other special housing requirements identified in local housing needs assessments?</li> </ul>

Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

SA Topics	Relevant SEA Topics	Revised SA Objectives	Revised SA Criteria and Indicators
<b>7: Equality &amp; Diversity (continued)</b>		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	<ul style="list-style-type: none"> <li>• How will options help to reduce inequality, poverty and social and economic deprivation for local communities, particularly communities with a high proportion of vulnerable groups, for example by ensuring that sites provided to meet specific needs are not exposed to unacceptable environmental problems or vulnerable to climate change effects?</li> <li>• How will options promote inclusive communities by ensuring that any new jobs, shops, open spaces and social infrastructure provided are accessible to all people living in the communities they are meant to serve?</li> </ul>
<b>8: Health &amp; Wellbeing</b>	Air Human Health Landscape Material Assets Population Soil Water	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 well-being of local communities and people who visit Walsall for work, shopping or leisure, by developing new health and social care infrastructure 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	<ul style="list-style-type: none"> <li>• How are options likely to affect the general health and well-being of Walsall residents, particularly in parts of the Borough where there are high levels of health problems?</li> <li>• Are options likely to increase risks to the health, safety and well-being of residents or those who visit Walsall for work, shopping or leisure, from existing and potential environmental problems or hazards?</li> <li>• Are options likely to encourage healthy and active lifestyles by improving access to sport and recreational facilities or incorporating opportunities for walking and cycling?</li> <li>• Are options likely to ensure that health and social care facilities are provided where there is a need, and that such facilities will be appropriately located, on sites that are accessible to the people they are meant to serve and will not be potentially vulnerable to risks from climate change (e.g. from flooding)?</li> </ul>

Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

SA Topics	Relevant SEA Topics	Revised SA Objectives	Revised SA Criteria and Indicators
<b>9: Landscape &amp; Townscape</b>	Cultural Heritage, including architectural and archaeological heritage Flora Fauna Landscape Material Assets Soil Water	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	<ul style="list-style-type: none"> <li>• Are options likely to adversely affect the openness and permanence of the Green Belt?</li> <li>• How will options contribute towards the BCCS “environmental infrastructure network,” such as the inclusion and protection of locally valued areas of landscape and townscape?</li> <li>• Are options likely to contribute positively towards landscape and townscape, by respecting and enhancing locally distinctive buildings, features and spaces, or improving areas where the landscape or townscape is of poor quality?</li> </ul>
<b>10: Material Resources</b>	Climatic Factors Human Health Material Assets Soil Water	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	<ul style="list-style-type: none"> <li>• How are options likely to affect mineral resources and existing mineral and waste infrastructure, including infrastructure for bulk transport of materials by rail?</li> <li>• How are options likely to maintain supplies of mineral resources needed to support the local economy and contribute towards the requirements for waste and mineral development identified in the BCCS?</li> <li>• Are options likely to minimise waste and facilitate management of unavoidable waste arising in Walsall in accordance with the “waste hierarchy” i.e. in ways that will divert as much waste away from landfill as possible and optimise the use of resource?</li> <li>• Are options likely to deliver new waste treatment, transfer and disposal infrastructure, and new mineral development, in appropriate locations, where harmful impacts on health and the environment can be avoided?</li> </ul>



Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

SA Topics	Relevant SEA Topics	Revised SA Objectives	Revised SA Criteria and Indicators
<b>11: Renewable &amp; Low Carbon Energy</b>	Climatic Factors Material Assets Population	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	<ul style="list-style-type: none"> <li>• Are options likely to help reduce Walsall's energy and fuel consumption, particularly from sources that generate significant CO<sub>2</sub> emissions such as housing, businesses and transport?</li> <li>• Are options likely to increase Walsall's capacity to generate energy and fuel from renewable and low carbon sources?</li> <li>• Would options have potential to contribute towards the development of "district heating" networks, for example, would they generate residual heat which could be exported to adjacent developments, or could they use residual heat generated by adjacent developments?</li> <li>• Are options likely to improve access to more affordable and reliable energy supplies for local households and businesses?</li> </ul>
<b>12: Soil &amp; Ground Conditions</b>	Human Health Material Assets Soil Water	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, or and 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	<ul style="list-style-type: none"> <li>• How are options likely to affect the quality of soils and the ecosystems that depend on them?</li> <li>• Are options likely to affect agricultural land within Walsall, and if so, what effect would they have on the "best and most versatile" agricultural land?</li> <li>• Are options likely to make efficient use of land, such as re-use of previously-developed land and existing buildings rather than greenfield land, and efficient use of materials, such as construction and demolition wastes?</li> <li>• Are options likely to increase risks to human health or the environment from existing contamination or geotechnical problems or by creating new problems?</li> </ul>

Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

SA Topics	Relevant SEA Topics	Revised SA Objectives	Revised SA Criteria and Indicators
<b>13: Transport &amp; Accessibility</b>	Air Climatic Factors Human Health Material Assets Population	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	<ul style="list-style-type: none"> <li>• How are options likely to impact on delivery of transport projects identified in the BCCS and West Midlands Local Transport Plan, and local policy objectives to improve connectivity within Walsall and between Walsall and wider transport networks?</li> <li>• How are options likely to help reduce congestion on road and rail networks, for example, by improving the flow of traffic and efficiency of train services?</li> <li>• Are options likely to help reduce or minimise the vulnerability of transport infrastructure to climate change effects?</li> <li>• Are options likely to help mitigate the harmful effects of road and rail transport on the environment and on the health, amenity and well-being of local communities (e.g. air quality, noise, safety)?</li> <li>• Are options likely to improve the efficiency and sustainability of freight movements by enabling goods and services to be moved by rail or inland waterway?</li> <li>• Are options likely to encourage people to make smarter, healthier transport choices, such as using public transport or cycling and walking for shorter journeys?</li> <li>• Are options likely to provide jobs, shopping facilities and other key facilities and services in centres or in other locations accessible to the communities they are meant to serve by a choice of transport modes?</li> </ul>

Walsall Site Allocation Document (SAD) and Town Centre Action Plan (AAP)  
Sustainability Appraisal Report (March 2016)

SA Topics	Relevant SEA Topics	Revised SA Objectives	Revised SA Criteria and Indicators
<b>14: Water Environment</b>	Climatic Factors Material Assets Soil Water	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 the 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	<ul style="list-style-type: none"> <li>• Are options likely to require abstraction of significant quantities of water or increase water consumption?</li> <li>• How are options likely to affect important water resources (e.g. Primary Aquifers and Groundwater Source Protection Zones)?</li> <li>• How are options likely to affect existing or planned waste water treatment infrastructure or potable water treatment and supply infrastructure, for example, by increasing vulnerability to climate change effects?</li> <li>• How are options likely to affect the water quality status of Walsall's surface water bodies or groundwater, and are they likely to prevent further deterioration of water quality status?</li> <li>• Are options likely to increase the risk of flooding from drains, culverts or groundwater?</li> <li>• Are options in locations likely to be at risk of flooding, and if so, are the risks acceptable?</li> </ul>

Source: SA Report – Appendices (February 2016), Appendix E

## 2.6 Appraisal Process – Methodology

### Appraisal Stages and Overall Process

The appraisal has been carried out in four main stages as outlined in Table 2 above:

- Stage 1 - 'Testing' of SAD and AAP Objectives against the SA Objectives
- Stage 2 - SAD and AAP Options Appraisal;
- Stage 3 – Identification and Appraisal of SAD and AAP Preferred Options; and
- Stage 4 – Refinement of Preferred Options and Appraisal of SAD and AAP Policies.

At each stage, each Objective, Option or Policy was subject to a 'High Level' assessment, using the Revised SA Framework developed in 2015 (see 2.5 above and **Appendix E**). The Objectives and Options Appraisals carried out in 2013 were updated in 2015 to reflect the changes to the SA Framework and changes to the Objectives and Options for the SAD and AAP (see Chapters 5 and 6). The appraisal process involved assessing the extent to which each Objective, Option or Policy would affect each of the SA Objectives.

To show how the SAD and AAP Objectives and Options have changed throughout the process, the changes made at each key stage are recorded in the SA Appendices and Matrices in coloured text. Changes at the Preferred Options stage (July 2015) are recorded in **blue text**, and changes prior to the publication (January 2016) are recorded in **purple text**.

### Evidence Used in the Appraisal

The appraisal has been informed by the officers' local knowledge, which is very considerable, the sources of evidence identified in the SA Framework (**Appendix E**) and in Chapter 4, and where relevant, the views expressed in responses to the public consultation on the SAD and AAP in 2013 and 2015 (see Chapter 1, Section 1.6). Use has been made of readily-available information only. Where effects are uncertain, the reasons have been explained, and no attempt has been made to gather new evidence, because it has been difficult enough with the limited resources available to collate and review the information that is already available.

## **Technical and Procedural Difficulties**

The main difficulties encountered were the limited resources available for development of the SA Framework, undertaking the various stages of the appraisal and for compiling the SA Report. The Council was entirely reliant on in-house staff resources for all aspects of the SA, except for 'peer review' which was carried out by an external advisor. The technical and procedural difficulties of gathering baseline evidence data for the SA are described in further detail in Chapter 4.

## **Recording of Appraisal Results – SA Matrices**

The results of the appraisals have been recorded in SA Matrices. These are Excel spreadsheets which have been developed from the High Level and Detailed SA Matrices in Appendices H and I of the Revised SA Scoping Report V2 (May 2013). Table 9 below is an example of part of a completed High Level SA Matrix, showing how an Objective, Option or Policy might 'score' against each SA Objective, depending on the overall effects anticipated.

The completed SA Matrices for the SAD and AAP Objectives Testing, Revised Options Appraisals, Appraisal of SAD and AAP Preferred Options and Appraisal of SAD and AAP Policies have been published alongside this report (see Contents). Summary versions of the SA Matrices recording the outcome of the SA of the Publication SAD and AAP Policies are reproduced at **Appendices J and K**. Table 10 below explains what the scores in the SA Matrix mean, and the reasons for selecting them.

## **High Level Appraisal – Assessment and Recording of Effects**

The evaluation of the effects of the Objectives, Options and Policies has inevitably been subjective, and in accordance with current 'best practice' no attempt has been made to impose any numerical scoring system. Throughout the process, the Council officers who have carried out the appraisal have used their considerable local knowledge, experience and judgement to establish the likely effects.

**Table 9: Simplified Example of Completed High Level SA Appraisal Matrix**

Plan Options/ Policies	Appraisal Results – Scoring Against SA Objectives															Overview of Option/ Policy and Likely Effects
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	Overall Score	
Option/ Policy 1	0	+	?	+	0	-	0	0	0	0	0	0	0	?	?	The overall effects are uncertain. It is likely to have harmful effects on SA6 because it would involve loss of industrial land. Effects on SA3 and SA14 are uncertain because the areas identified are at risk from flooding.
Option/ Policy 2	0	+	0	++	+	+	+	?	+	0	0	+	+	0	+	The overall effects are likely to be positive. It is likely to have very positive effects on SA4 and SA7 and positive effects on SA2, SA5, SA9, SA12 and SA13 because it would enable provision of a significant amount of new housing and open space near to public transport links.
Option/ Policy 3	?	0	?	0	0	+	0	0	0	0	0	?	?	?	?	The overall effects are uncertain. Positive effects on SA6 in terms of providing industrial land, but effects on SA1 and SA13 are uncertain because it would involve development in road corridors which are NO2 Areas Exceedance, effects on SA3 and SA14 also uncertain because it involves some development in a Flood Zone.
Option/ Policy 4	0	+	+	+	++	+	0	0	++	+	0	+	0	0	++	The overall effects are likely to be very positive. It is likely to have very positive effects on SA5 and SA9 because it will help to conserve an important historic landscape, and could also have positive effects on SA2, SA4, SA6 and SA12 as it would help remediate derelict land which would benefit local communities and adjacent businesses and provide opportunities for biodiversity enhancement.
Option/ Policy 5	?	0	?	-	0	-	0	0	0	0	0	?	--	?	-	The overall effects are likely to be negative. There could be significant negative effects on SA13 because it involves development in a road corridor affected by congestion although there is some uncertainty. There is also potential for harmful effects on SA4 and SA6 because it involves potentially "bad neighbour" development near to existing homes and businesses. Effects on SA1, SA3 and SA14 uncertain because of potential risks from NO2 and flooding.

Source: Extract from Revised High Level SA Matrix – see Revised SAD and AAP Options Appraisals and Appraisals of SAD and AAP Policies – Completed Matrices (January 2016)

**Table 10: Sustainability Appraisal of SAD and AAP – Scoring of Options and Policies**

<b>Symbols</b>	<b>Meaning</b>	<b>Reasons for Scoring Selection</b>
<b>++</b>	<b>Likely to have strong positive effects</b>	This score has been applied where an Option or Policy is likely to be particularly beneficial/ complimentary towards the achievement of the SA Objectives, for example, where would contribute directly towards meeting one or more of the SA Objectives.
<b>+</b>	<b>Likely to have positive effects</b>	This score has been applied where an Option or Policy is likely to have some beneficial/ complimentary effects on the SA Objectives, for example, where it would indirectly contribute towards meeting one or more of the SA Objectives or would be complementary, or where the potential positive effects identified are likely to outweigh any potential negative effects identified.
<b>0</b>	<b>Likely to have neutral/ no effects</b>	This score has been applied where an Option or Policy is likely to have no effects on the SA Objectives or where the effects would be negligible or net neutral overall, for example, where there would be both positive and negative effects, but overall there would be a balance between the positives and negatives so that one does not outweigh the other.
<b>-</b>	<b>Likely to have negative effects</b>	This score has been applied where an Option or Policy is likely to be detrimental/ harmful to the achievement of the SA Objectives, for example, where there would be an indirect conflict with one or more of the SA Objectives, or where the potential negative effects identified are likely to outweigh any potential positive effects identified.
<b>--</b>	<b>Likely to have strong negative effects</b>	This score has been applied where an Option or Policy is likely to be very detrimental/ harmful to the achievement of the SA Objectives, for example, where it would directly conflict with one or more of the SA Objectives.
<b>?</b>	<b>Effects uncertain</b>	This score has been applied where the effects of an Option or Policy on the SA Objectives are uncertain, for example, where there are a number of variables, or where there are likely to be both positive and negative effects, but it is not possible to determine whether one would outweigh the other, or that the overall effects would be neutral.
<b>N/A</b>	<b>Not applicable – Option not subject to appraisal</b>	This score has been applied to Options which have been rejected from the outset because they are not a “reasonable alternative” for the plan, and have therefore not been subjected to SA. The SEA Directive only requires the Council to consider “reasonable alternatives” so it is not necessary to appraise Options that are not considered to be “reasonable.” The Options rejected for this reason are listed in Appendices L and M, which explain the reasons why they are not “reasonable alternatives.”

Source: Walsall Council

As well as the fields for ‘scoring’ the overall effects, the High Level SA Matrix used in the Options Appraisals and appraisal of SAD and AAP Policies included fields for assessors to complete with details of the types of effects likely to arise, the reasons for the scoring given, and the implications for the plans. However, the High Level SA Matrix used in the testing of SAD and AAP Objectives was simpler, and included a single Commentary field for summarising the outcome of the testing process.

Further refinements were made to the SA Matrix in 2015, to include additional response fields in response to the feedback received from the SA Consultant on the original Options Appraisal in 2013, and the range of issues that the SA needs to consider (see 2.3 above). The response fields included in the SA Matrix are listed in Table 11 below.

**Table 11: High Level SA Matrix – Response Fields**

<b>Additional Response Fields</b>	<b>Examples of Information Recorded</b>
<b>Overview of Option/ Policy and Likely Effects</b>	This field provides a brief description of the Option or Policy and summarises the overall outcomes of the appraisal.
<b>Potential Effects on Equality and Diversity - Implications for EqIA</b>	This field has been completed where the Option or Policy could have direct or indirect effects on equality and diversity (SA6), for example, where the Option could make conditions better or worse for people already affected by deprivation, or where the Option could have disproportionate effects on people with “protected characteristics.”
<b>Potential Effects on Health and Wellbeing - Implications for HIA</b>	This field has been completed where the Option or Policy could have direct or indirect effects on health or wellbeing (SA8), for example, where the Option could affect existing health and social care infrastructure or delivery of new infrastructure, or could discourage active lifestyles due to impacts on access to open space, sports facilities or walking and cycling routes.
<b>Positive Effects</b>	This field has been completed where the Option or Policy is likely to have positive effects overall or positive effects on one or more of the SA Objectives – see Table 25 above for further details of the circumstances where a positive or strong positive score would be appropriate.
<b>Negative Effects</b>	This field has been completed where the Option or Policy is likely to have negative effects overall or negative effects on one or more of the SA Objectives - see Table 25 above for further details of the circumstances where a positive or strong negative score would be appropriate.
<b>Likely Duration of Effects</b>	This field has been completed with details of how long the effects of the Option or Policy are expected to last, for example, the anticipated timescale for delivery of development, or period of time when proposals are likely to come forward.
<b>Secondary, Cumulative and Synergistic Effects</b>	This field has been completed with details of potential secondary effects of the Option or Policy (indirect effects that could arise), cumulative effects of the Option or Policy (effects combined with the effects of existing or planned development), and synergistic effects of the Option or Policy (potential added benefits when considered alongside the benefits of other existing or planned development).



Additional Response Fields	Examples of Information Recorded
<b>Inter-relationships Between Effects</b>	This field has been completed with details of combinations of effects that could be linked, for example, Options or Policies that could generate a significant net increase in road traffic, affecting accessibility, are also likely to be generating air pollutants and CO2 emissions.
<b>Impacts on Relevant Standards, Regulations, Thresholds and Targets</b>	This field has been completed where an Option or Policy could affect the achievement of European, national or local standards or targets, for example, where it could generate pollution that could affect the achievement of statutory limit values for air pollutants or water quality, or where it could be delivering new housing or industrial land to meet the requirements identified in the BCCS.
<b>Uncertain Effects</b>	This field has been completed where the effects of the Option or Policy overall or on one or more SA Objectives are uncertain for the reasons identified in Table 25 above. An uncertain score may also be applied if significant constraints are known to exist in a particular location proposed for development, but there has been no evaluation of the effects of development in this location at a local level, so it is not clear whether the potential harmful effects of development could be effectively mitigated.
<b>Trans-Boundary Effects</b>	This field has been completed where there is potential for an Option or Policy to affect land, property, people or businesses in another authority area, for example, where it involves development near to the boundary with another authority and could benefit people living outside the borough, or put pressure on infrastructure and services in other areas.
<b>Significant Effects</b>	This field has been completed where the appraisal has predicted that the Option or Policy is likely to have “significant” effects overall, or “significant” effects on one or more of the SA Objectives, i.e. where potential for strong positive or strong negative effects have been identified.
<b>Significant Adverse Effects - Mitigation</b>	This field has been completed where the Option or Policy is likely to have “significant” negative effects, with details of potential measures that could be implemented to mitigate the harmful effects or offset them through enhancements and improvements. Where relevant reference can be made to other planned development including measures outside of the planning system that could help to mitigate the effects.
<b>Implications for Plan</b>	This field has been completed with details of the implications of the appraisal results for the plan. For example, this field can indicate whether the outcomes of the appraisal suggest the Option or Policy should be rejected, because it is less likely to deliver sustainable development than other alternatives, or that it should be included in the SAD or AAP, because it is likely to be beneficial. In this field, officers can also record a need to include particular requirements if it is included in the plan, to address potential harmful effects are addressed, or that benefits are realised.

Source: Walsall Council

## **Detailed Appraisal – Assessment and Recording of Significant Effects**

It should be apparent from the SA Matrices that the High Level SA of the SAD and AAP Options and Policies has been very comprehensive, and has included consideration of all of the types of effects identified in and Schedules 1 and 2 of the SEA Regulations. A Detailed SA has therefore only been undertaken where the High Level SA of the SAD and AAP Policies has identified actual or potential significant harmful effects.

Such effects were only identified in two cases:

- SAD Policy M8: Brick Clay Extraction – Other Areas; and
- SAD Policy M9: Coal and Fireclay Extraction - Brownhills

These policies were therefore subject to a Detailed SA, the outcomes of which are recorded in the published Detailed SA Matrices for these policies. The implications for the SAD and for future monitoring of the effects are explained in the SA Matrices and in Chapters 7 and 9.

## **Mitigation of Effects – General Approach**

Where potential harmful effects were identified in the High Level SA of the Preferred Options for the SAD and AAP or in the SA of the SAD and AAP Policies prior to Publication, these have been addressed as far as possible through modifications to the relevant policies as outlined in Chapters 7 and 8.

## **Monitoring of Significant Effects**

For the reasons explained in Chapter 9, no special requirements for monitoring of the potential 'significant' effects of the SAD and AAP have been identified, over and above the monitoring indicators already identified in the plans themselves.