

# Black Country | **Plan**

Planning for the future of the Black Country



HOUSING



ENVIRONMENT



EMPLOYMENT



TRANSPORT

## **Draft Black Country Plan Site Assessment Report: Assessment and Selection Methodology and Results August 2021**

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# 1. Introduction

- 1.1 The Draft Black Country Plan (BCP) identifies a requirement for 76,076 homes and 565 ha of employment land over the Plan period 2020 – 2039.
- 1.2 The BCP will be both a strategic plan and a local plan<sup>1</sup>, in that it will seek to allocate the majority of housing and employment development sites necessary to deliver housing and employment land targets over the Plan period. The Plan will allocate sites of all sizes and uses which require the release of green belt land, and all sites within the urban area which can accommodate at least 10 homes or 0.4 ha of employment land, with the exception of sites located within the Strategic Centres of Brierley Hill, West Bromwich, Walsall and Wolverhampton.
- 1.3 Whilst the majority of the housing and employment requirement is expected to be delivered by developments which are already committed, (comprising those with planning permission, those under construction as of March 2020, those allocated in existing Local Plans and other suitable sites in the urban area identified in Strategic Housing Land Availability Assessments), there is a shortfall in the amount of housing and employment land available to meet future needs.
- 1.4 In order to support delivery of homes and employment sites across the Black Country where they are needed, the Draft BCP therefore proposes to allocate further housing and employment land in each of the four Black Country Authorities.

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<sup>1</sup> As defined in the National Planning Policy Framework

## 2. Site Assessment and Selection Methodology

- 2.1 This report explains the methodology and the process which was applied by the Black Country Authorities to assess and select the most appropriate sites for allocation for housing and employment development in the Draft BCP. It also presents the site assessment methodology and results for Local Green Space designations in the Draft BCP.

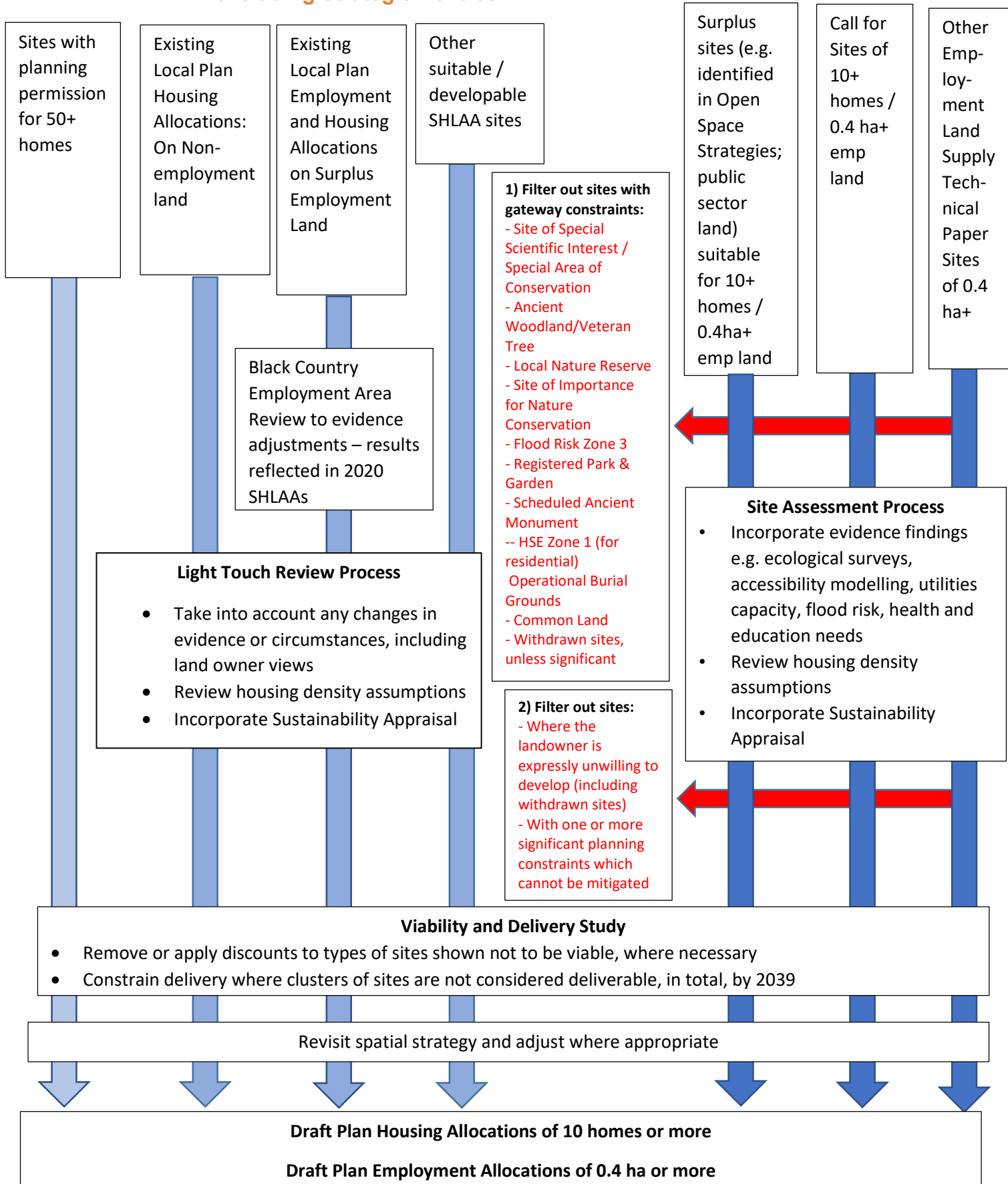
### Urban Area Method

- 2.2 In accordance with the Black Country Core Strategy (2011) spatial strategy and national guidance, the urban area of the Black Country was first explored for potential development sites and housing density policy tested and adjusted where necessary to maximise housing capacity on these sites, as set out in the Black Country Urban Capacity Review (2020). The methodology for assessment and selection of sites within the urban area is set out in Diagram 1.
- 2.3 The site assessment and selection process does not apply to the areas covered by the four Strategic Centres. Instead, broad targets for housing, retail and office floorspace have been provided for each Strategic Centre, based on evidence (a Tier 1 approach). This approach is robust because Wolverhampton and Walsall are covered by recently adopted detailed Plans (a Tier 2 approach) and detailed Plans for Brierley Hill and West Bromwich are being progressed alongside the BCP. Therefore, there is sufficient certainty regarding the amount of housing likely to be brought forward in the Strategic Centres over the Plan period. The Tier 2 Plans will be subject to review alongside or following adoption of the BCP.
- 2.4 Existing Local Plan employment and housing allocations have been reviewed and carried forward into the Draft BCP using a “light touch” review process, reflected in the allocations tables in the Draft BCP. The light touch approach is appropriate because the allocations have been tested at examination in recent years, and those allocated for housing have up-to-date information on suitability and deliverability as set out in 2020 Strategic Housing Land Availability Assessments (SHLAAs). Density uplifts have been applied where appropriate, where the site is considered unlikely to have planning permission when the BCP is adopted in 2024. Where sites are reviewed in the light of evidence and are proposed for a different use than that currently allocated they have been subject to a more detailed Site Assessment. The light touch review approach has also been applied to other SHLAA sites considered suitable and developable for housing.
- 2.5 A site size threshold of 0.4 ha has been applied for employment use in most cases, as set out in Diagram 1. While small sites can provide a constant supply

of developable land, in overall terms, they make a limited contribution to the delivery of overall development needs. The availability of such sites can also be difficult to predict and so the Plan adopts assumptions over the yield of such sites over the Plan period based on historic trends. Policies EMP2, EMP3 and EMP4 support the delivery of sites within existing employment areas within which the vast majority of sites of less than 0.4ha are expected to come forward.

- 2.6 In a large urban area with a significant supply of smaller housing sites coming forward each year, it is considered impractical and unnecessary to allocate all of these smaller sites in the emerging BCP. Therefore, a threshold of 10 homes has generally been used for sites without planning permission and a threshold of 50 homes for sites with planning permission, as set out in Diagram 1. Large housing sites with planning permission have been allocated to ensure that these significant sites are not lost from housing supply to other uses.
- 2.7 It should be noted that, although these smaller sites may not be allocated in the BCP, they will be included in the housing land supply figures used in the BCP, subject to appropriate discounts to allow for non-implementation. The housing land supply will also include windfall allowances for certain types of sites within the urban area. Further information is provided in the Black Country Urban Capacity Review Update (2020) which can be viewed on the Black Country Plan website.
- 2.8 During 2017-21, two “call for sites” exercises took place seeking the submission of potentially suitable development sites. All of the sites in the urban area submitted through the call for sites exercises have been subject to a Site Assessment, except for:
- sites meeting the criteria for assessment through a light touch review (see para 2.4);
  - sites with a gateway constraint (as set out in box 1 of Diagram 1);
  - sites where the land owner has subsequently withdrawn the site (unless this is a significant site where a Site Assessment would clarify the suitability of the site for development).

**Diagram 1 Site Assessment and Selection Methodology: Urban Area excluding Strategic Centres**



## Green Belt Method

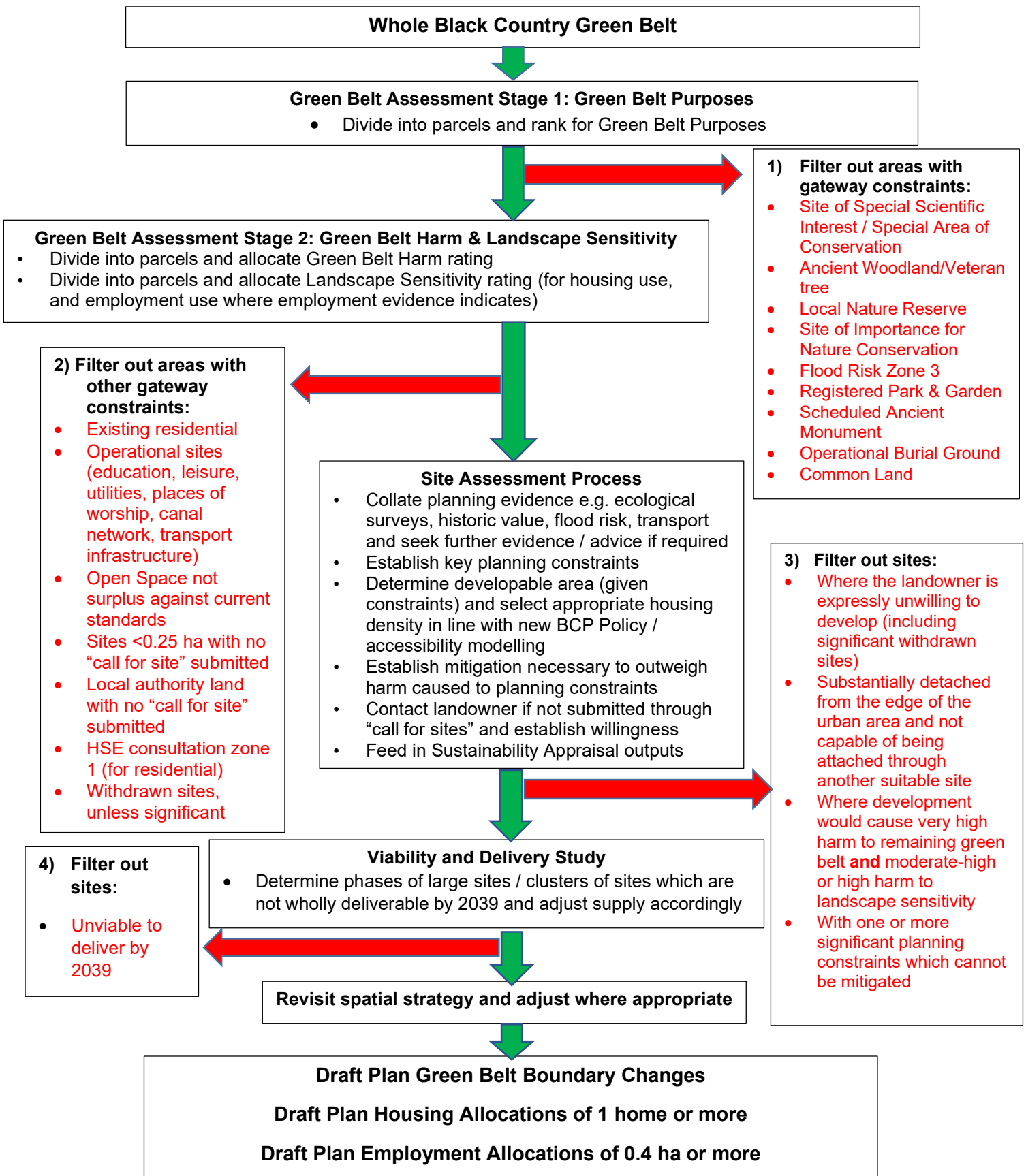
- 2.9 As set out in the Black Country Plan Issues and Options Report, it was apparent early in the Plan preparation process that the supply of land in the urban area was unlikely to be sufficient to meet the high levels of housing need arising in the Black Country authorities, and the high demand for new employment land to meet economic needs. Therefore, a Green Belt Assessment was commissioned in September 2018, jointly with South Staffordshire Council. The Green Belt Study and Landscape Sensitivity Assessment Reports for the four Black Country authorities which are the product of this Assessment have been published alongside this paper and can be viewed on the Black Country Plan website.
- 2.10 A separate methodology for the assessment and selection of sites which are currently located in the Black Country Green Belt is set out in Diagram 2. The two diagrams intersect in the final stages.
- 2.11 The method reflects para 142 of the NPPF, which states:
- “... Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. ...”
- Green belt sites which are previously developed have only been excluded from selection if they are located in areas of the highest Green Belt Harm and Landscape Sensitivity and this harm cannot be reduced through development of a smaller parcel of land; or if they are affected by another significant planning constraint which cannot be mitigated. Accessibility of sites to a variety of residential services by sustainable transport (foot and public transport) in line with the minimum standards set out in the Draft BCP Policy HOU2 has been rigorously assessed (see Section 4 - 4) Social).
- 2.12 A site size threshold of 0.4 ha has been applied for employment use in most cases, as set out in Diagram 2. While small sites can provide a constant supply of developable land, in overall terms, they make a limited contribution to the delivery of overall development needs. The availability of such sites can also be difficult to predict and so the Plan adopts assumptions over the yield of such sites over the Plan period based on historic trends. Policies EMP2, EMP3 and EMP4 support the delivery of sites within existing employment areas within which the vast majority of sites of less than 0.4ha are expected to come forward.
- 2.13 No threshold has been applied to green belt sites for housing use, as housing use is generally not in accordance with national policy for green belt land and therefore housing sites could only come forward through the release of green belt land for development through the BCP process
- 2.14 During 2017-21, two “call for sites” exercises took place seeking the submission of potentially suitable development sites. All of the green belt sites submitted through the call for sites exercises have been subject to a Site Assessment, except for:



- sites with a gateway constraint (as set out in box 1 of Diagram 2);
- sites where the land owner has subsequently withdrawn the site (unless this is a significant site where a Site Assessment would clarify the suitability of the site for development).

2.15 In order to ensure that all possible site options had been considered, it was also necessary to consider for Site Assessment those parts of the Black Country Green Belt which had not been submitted through the call for sites exercises. Therefore, those parts of the Green Belt without constraints (as set out in boxes 1 and 2 of Diagram 2) were split into parcels and subject to a Site Assessment. Where a parcel received a favourable Site Assessment outcome, the land owner was contacted to establish if they were willing and able to develop the site during the Plan period.

**Diagram 2 Site Assessment and Selection Methodology: Green Belt**



## Local Green Space Method

- 2.16 NPPF Paragraph 101 states that “The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and, be capable of enduring beyond the end of the plan period”. Therefore, as part of the Call for Sites process submissions for sites to be considered as Local Green Space (LGS) were invited.
- 2.17 Whilst there is no prescriptive method for assessing sites to be considered as a LGS, NPPF Paragraph 102 sets out some parameters of when the designation should be used: “The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land”. The NPPG also address issues around designating land as LGS, which assist with the assessment methodology.
- 2.18 The methodology for assessing sites was based around the parameters that the NPPG sets out. For Part A of the assessment basic information on a site was captured, such as site name, address, who the site was submitted by and its Ward. All submissions were also plotted and given a Site ID reference number, where this was possible as some sites were submitted without a clear boundary. If a site is already designated this was also recorded, such as Green Belt. The NPPG states that a site should also be supported by the local community that it serves and this was also recorded as part of the submission, if evidence had been provided to demonstrate this. This also allowed sites to progress to Part B of the assessment.
- 2.19 Part B of the assessment looked at; Beauty, Historical Significance, Recreational Value and Tranquillity and Wildlife. It considered any information that was submitted with the site or any additional information that was known, such as Rights of Way, ecological records and historical uses of the site. These areas were assessed in line with NPPF paragraph 100 b.
- 2.20 The size of the site was also looked at as part of the assessment as the NPPF states that a LGS should not be an extensive tract of land. Given the urban nature of the Black Country it was decided that any sites over 15ha would be considered extensive with the context of the local area. It should be noted that there is no lower size limit for a site to be considered a LGS.
- 2.21 As LGS’s are given the same protection as Green Belt, the NPPG makes it clear that consideration should only be given to designating a site as LGS that is already designated as Green Belt when it would provide additional local

benefit. Despite some sites potentially meeting LGS criteria where they are currently designated as Green Belt it was felt that designating them as LGS would bring no additional local benefit or protection to these sites, as they are protected by current policy.

- 2.22 All of the criteria were RAG rated from Red to Green and sites scoring significantly green across the criteria were potentially suitable to be allocated as LGS (Green Belt Considerations also looked at). Where submissions were not supported by additional information Part B could not be assessed and this section was rated as Red. Additional efforts were made to ask supporting information to be submitted, if this was not originally done as part of the submission.

### **3. Site Assessment Process and Presentation of Results**

- 3.1 A unique site assessment reference has been allocated for each site assessed e.g. SA-0001-WOL, and a Site Assessment Form has been completed for each site assessed, as set out in Appendices A-D. The forms are listed separately: by local authority area; by end use (housing or employment use); and by sites selected and sites not selected. Where a site has been assessed for both housing and employment use, this is referenced. For sites not selected, the main reasons are provided.

#### **Sites Assessed for Housing Use**

- 3.2 Where sites have been submitted through the call for sites or local SHLAA process for housing use, they have been assessed for housing use and supporting residential infrastructure, where appropriate. All green belt parcels have been assessed for housing use.

#### **Sites Assessed for Employment Use**

- 3.3 The basis on which sites have been assessed for employment use is set out in the Employment Land Supply Technical Paper. In summary, the sites which have been assessed are: those submitted through the call for sites for employment use; sites identified in work associated with the BEAR, including site surveys and landowner engagement; sites with a current or lapsed planning permission for employment use; and sites put forward for consideration for employment development as part of the preparation of Local Plans (excluding existing allocations).
- 3.4 Where appropriate, sites submitted through the call for sites for housing use and green belt parcels have been assessed for employment use where such use would not be constrained by the proximity of sensitive neighbouring uses or unsuitable access arrangements.
- 3.5 As part of the site assessment process, sites assessed for employment use were market tested to determine their suitability from an occupier and developer perspective.
- 3.6 A number of sites have been assessed for both housing and employment use. Sites considered suitable for both uses, following Site Assessment, have generally been prioritised for employment use, as there are limited opportunities for employment development in the Black Country and these are locationally specific.
- 3.7 A Site Assessment Group Panel, made up of the leading Site Assessment officers from each of the Black Country Authorities, have met regularly

throughout the Site Assessment process to review assessments and ensure consistency in approach. At least one site visit has been undertaken for every site and any relevant features recorded in the Site Assessment forms. Photos were taken to assist with the completion of assessments and for review by the Site Assessment Group Panel.

- 3.8 For each local authority, a summary table and a set of ward maps is provided to allow for identification of the sites assessed. A separate table is also provided listing sites which were submitted through the Black Country Plan “call for sites” exercises during 2017-21, but which have not been subject to a Site Assessment for reasons set out in para’s 2.8 and 2.13 above. These sites have not been subject to Sustainability Appraisal as they are not considered “reasonable alternatives”.
- 3.9 There is an online map of all sites assessed. Weblinks to this map are provided in the Site Assessment Forms.

### **Sites Assessed for Local Green Space**

- 3.10 Sites for Local Green Space designation consideration were submitted through the Call for Sites. These sites were assessed against the criteria set out in the NPPF. All sites submitted were assessed against Part A criteria (size, a defined boundary, distance to the community and support). Those sites which met the Part A criteria and where additional supporting information was submitted, were assessed against Part B criteria (Beauty, Historical Significance, Recreational Value, Tranquillity and Wildlife).
- 3.11 Assessments of sites were undertaken by officers based on the information submitted. For sites to be recommended for designation, they would need to meet all the criteria in Part A and shown to have value in a number of the Part B criteria. Details of the assessments of all sites are provided within the Local Green Space Proformas, including reasoning for or against designating a site.

## 4. Site Assessment Criteria

4.1 The Site Assessment criteria have been applied using a traffic-light system of assessment, based on a Red, Amber, Green (RAG) methodology, as set out below. At Draft BCP stage there is also a Blue category to indicate lack of evidence, which will be addressed by Publication stage.

Sensitivity Score	Description	Possible Mitigation
<b>RED</b>	There is a very substantial negative effect or issue that is unlikely to be capable of acceptable mitigation.	No mitigation possible in order to make the site acceptable or significant mitigation required which could prevent the site being acceptable
<b>AMBER</b>	There is a moderate negative effect or issue which may be able to be adequately addressed but only subject to mitigation.	Likely to require low-medium levels of mitigation in order to make the site acceptable
<b>GREEN</b>	There are no effects or issues of significance that require mitigation.	Negligible or no mitigation required to make the site acceptable
<b>BLUE</b>	There could be a negative effect and further information/evidence is required to determine if this can be mitigated.	Await evidence to determine.

4.2 A summary description of each of the Site Assessment criteria, and how the RAG ratings have been applied for each criteria, is set out below. The criteria have been grouped together under the headings:

- 1) Green belt and landscape sensitivity
- 2) Environmental
- 3) Economic
- 4) Social

Information is also provided in the form on: Background / Context; Gateway Constraints; Opportunities; and Sustainability Appraisal conclusions, which have also been RAG rated. A Conclusions section at the end of each form summarises the findings of the Site Assessment and, if selected, recommends an appropriate housing or employment land capacity and mix of uses for the site.

4.3 It should be noted that the order of the criteria in the form does not imply a greater level of importance has been applied to any particular criteria.

## 1) Green Belt and Landscape Sensitivity

These parts of the form have been completed for sites which fall within the Black Country Green Belt only.

The Site Assessment provides the conclusions from the final two stages of the Green Belt Study and Landscape Sensitivity Assessment (GBS & LSA), which consider:

- the potential harm to the remaining green belt if a particular parcel of green belt were developed; and
- the sensitivity of the landscape character of a particular parcel of green belt to development.

The studies identified a greater range of harm to green belt (ranging from Very Low to Very High) than landscape sensitivity (Low to High). Taking into account this variation, the categorisation has been made as follows:

	<b>Green Belt Harm</b>	<b>Landscape Sensitivity</b>
<b>Green</b>	Very Low / Low / Low-Moderate	Low / Low-Moderate
<b>Amber</b>	Moderate / Moderate-High	Moderate
<b>Red</b>	High / Very High	Moderate-High / High

It should be noted that the GBS & LSA conclusions relate to a parcel of green belt land which is often larger than the site being assessed. In some cases, the impact of developing a small part of a larger parcel has been judged likely to be lower than for the whole parcel. Where this is the case, reasons have been given in the form, with reference made to the detailed findings of the GBS & LSA where appropriate.

Sites located in areas where development is likely to cause very high harm to remaining green belt **and** where landscape sensitivity to development is likely to be moderate-high or high have been considered not suitable for development, as set out in box 3 of Diagram 2. Both moderate-high and high landscape sensitivity have been used to define this criteria because there are only two areas of high landscape sensitivity in the Black Country Green Belt (in Dudley), therefore moderate-high is effectively the highest level of landscape sensitivity for all Black Country authorities.

Other than this specific criteria, red ratings for green belt harm and landscape sensitivity have not been considered to constitute “significant planning constraints which cannot be mitigated”, as set out in box 3 of Diagram 2.

This is because there are large areas of High / Very High Green Belt Harm and Moderate–High / High Landscape Sensitivity across the Black Country Green Belt. These areas tend to be located close to the urban edge, in locations which are often the most sustainable for development. Therefore, given the high levels of housing and employment land need which the Black Country Plan is seeking to meet, it was considered that neither Green Belt Harm alone nor Landscape Sensitivity alone could be used to rule out selection of a site for development.



## 2) Environmental

### *Greenfield / Previously Developed Land*

Previously Developed Land is defined in the NPPF as: ‘Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.’

Council records and the site visit provide the basis for the assessment of the status of the land. National Planning Guidance supports the reuse of Previously Developed Land in preference to development of Greenfield sites. The NPPF (para 138) states that, “...Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. ...”

The categorisation has been made as follows:

<b>Green</b>	No greenfield or greenfield can be incorporated into non-developable area without reducing capacity
<b>Amber</b>	Minority greenfield
<b>Red</b>	Majority greenfield

### *Topography*

Council records and the site visit provide the basis for the assessment of the status of the land.

The categorisation has been made as follows:

<b>Green</b>	No / negligible constraint on capacity
<b>Amber</b>	Minority not developable / viable to remodel site
<b>Red</b>	Majority not developable / unviable to remodel site

### *Agricultural Land Quality*

Where sites include land in agricultural use, DEFRA and Natural England resources ([Guide to Assessing Development Proposals on Agricultural Land](#)), Council records and communication with land owners have been used to determine the quality of that land. This is because the National Planning Policy Framework (NPPF) (para 171) seeks to protect the best and most versatile (BMV) agricultural land and expects Plans to designate areas of poorer quality land for development in preference to that of higher quality.

Agricultural land of grade 1, 2 or 3a is considered to be BMV. However, in most cases the available data does not differentiate between Grades 3a and 3b, and the cost of carrying out field surveys to determine grade would be prohibitive - therefore this distinction could not be made in Site Assessments.

The guidance is clear that less significance should be accorded to the loss of areas of land of less than 20ha e.g. Natural England only ask to be consulted on proposals affecting sites of over 20ha. In accordance with this, NPPF footnote 53 states that “Where *significant* development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.” (our emphasis). Therefore, where sites assessed are less than 20ha in size, BMV agricultural land has not been highlighted as a planning constraint.

The categorisation has been made as follows:

<b>Green</b>	Not agricultural / < 20 ha
<b>Amber</b>	Grade 3 / Grade 3b
<b>Red</b>	Grade 1, 2 or 3a

### **Tree Preservation Orders (TPOs) / Mature Trees of Value**

Existing Council records of protected trees and a visual assessment made from the site visit of established trees to identify those worthy of retention.

The categorisation has been made as follows:

<b>Green</b>	No relevant trees / negligible impact on site capacity
<b>Amber</b>	Limited development possible without harm to relevant trees or subject to sufficient mitigation
<b>Red</b>	Capacity significantly limited unless harm is caused to relevant trees, which cannot be wholly mitigated

### **Biodiversity and Geodiversity**

Existing Council records inform the status. Ecological appraisals which informed Local Sites Assessments were carried out for the most sensitive sites and their findings are included in the assessment. Impacts on local sites such as these can sometimes be mitigated by providing environmental enhancements to deliver net biodiversity gain on the site or nearby land.

The categorisation has been made as follows:

<b>Green</b>	No habitat / negligible impact on site capacity
<b>Amber</b>	Limited development possible without harm to habitat of SINC / SLINC value or subject to sufficient mitigation
<b>Red</b>	Capacity significantly limited unless harm is caused to habitat of SINC / SLINC value, which cannot be wholly mitigated

### **Heritage Assets**

Council records identify Listed and Locally Listed buildings, Conservation Areas, Scheduled Ancient Monuments and areas of archaeological importance to determine potential harm and any design or separation requirements for development. Up-to-date Conservation Area appraisals have been completed for a number of Conservation Areas in the Black Country Green Belt and their findings are included in the assessment.

The categorisation has been made as follows:

<b>Green</b>	No assets / negligible impact on site capacity
<b>Amber</b>	Limited development possible without harming asset or subject to sufficient mitigation
<b>Red</b>	Capacity significantly limited unless harm is caused to asset(s) which cannot be wholly mitigated

### **Visual Amenity and Character of the Area**

An assessment of the potential impacts of development on the visual amenity of adjacent land users (including existing residents) and local character. Local and wider impacts are considered and whether those impacts are significant and could be mitigated.

The categorisation has been made as follows:

<b>Green</b>	No significant local character or visual amenity impacts / negligible impact on site capacity
<b>Amber</b>	Limited development possible without harming visual amenity / local character or subject to sufficient mitigation
<b>Red</b>	Capacity significantly limited unless harm is caused to visual amenity / local character which cannot be wholly mitigated

### **Flood Risk, Drainage and Ground Water**

The Black Country Strategic Flood Risk Assessment (2020), latest available flood risk information, known drainage issues and potential to provide sustainable urban drainage (SUDS) mitigation was recorded and considered. In some cases this has reduced the developable area.

The categorisation has been made as follows:

<b>Green</b>	No drainage / flood risk issues / negligible impact on site capacity
<b>Amber</b>	Drainage or flood risk issues which can be sufficiently mitigated without significantly reducing capacity
<b>Red</b>	Capacity significantly limited due to drainage issues which cannot be mitigated or does not pass SFRA sequential / exception tests

### **Ground Contamination**

Council records and officers assessment on the status of contamination and likely remediation requirements.

The categorisation has been made as follows:

<b>Green</b>	No known issues / negligible constraint on capacity
<b>Amber</b>	Minority not developable / viable to remediate site
<b>Red</b>	Capacity significantly limited / unviable to remediate site

### **Ground Stability**

Council records to identify past mining constraints and fault lines which could be a constraint or barrier to development.

The categorisation has been made as follows:

<b>Green</b>	No known issues / negligible constraint on capacity
<b>Amber</b>	Minority not developable / viable to remediate site
<b>Red</b>	Capacity significantly limited / unviable to remediate site

### **Air Quality Impact of Adjoining Uses**

Nitrogen Dioxide Area of Exceedance Zone maps were considered and any mitigation as recommended by Pollution Control officers. Officer assessment of both neighbouring uses, their impact on housing or employment development, and any potential impact from such development on existing neighbouring uses, comments received from Pollution Control Officers were also incorporated into assessments.

The categorisation has been made as follows:

<b>Green</b>	No known issues / negligible constraint on capacity
<b>Amber</b>	Air quality issues which can be sufficiently mitigated without significantly reducing capacity
<b>Red</b>	Capacity significantly limited due to poor air quality which cannot be wholly mitigated

### **Noise Impact of Adjoining Uses**

Officer assessment of both neighbouring uses, their impact on housing or employment development, and any potential impact from such development on existing neighbouring uses, comments received from Pollution Control Officers were also incorporated into assessments.

The categorisation has been made as follows:

<b>Green</b>	No known issues / negligible constraint on capacity
<b>Amber</b>	Noise issues which can be sufficiently mitigated without significantly reducing capacity

<b>Red</b>	Capacity significantly limited due to unacceptable noise levels which cannot be wholly mitigated
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### **Mineral Extraction and Mineral Resource Areas / Mineral Infrastructure and Brickworks**

Assessment of the site mineral constraints based on Council records and the Black Country Minerals Study (2020). It is important to prevent the loss of mineral resources from surface developments. The assessment addresses whether sites are within Mineral Safeguarding Areas (MSA) or in close proximity to any mineral extraction sites. Suitable mitigation is suggested where required.

The categorisation has been made as follows:

<b>Green</b>	No mineral extraction or mineral resource / infrastructure constraints
<b>Amber</b>	Site within a Proposed MSA for bedrock sand and gravel, brick clay (Etruria Marl) or fireclay in Walsall; or site is within 250m of an Other Permitted Mineral Infrastructure Site <sup>2</sup> or Brickworks
<b>Red</b>	Site is within 250m of a Permitted Mineral Extraction Site and/ or Area of Search or Site is within 250m of a Rail-linked Aggregates Depot

### **Waste Infrastructure**

Black Country Waste Study (2020), Council records and planning history search to identify sites and consider likely impacts. This includes: landfill sites, waste transfer sites, biological treatment of waste sites (composting, anaerobic digestion) and thermal treatment of waste sites (incineration).

The categorisation has been made as follows:

<b>Green</b>	No waste infrastructure constraints
<b>Amber</b>	Site is within 250m of an Other Permitted Waste Site
<b>Red</b>	Site is within 250m of a Proposed Strategic Waste Site

<sup>2</sup> Other mineral infrastructure sites include secondary/ recycled aggregate production facilities, coating plants (for production of asphalt and roadstone), concrete batching plants, lime/ mortar/ cement works, factories manufacturing concrete products and distribution depots for mineral products.

### 3) Economic

#### *Employment Development Opportunities*

Sites with potential for employment uses were assessed for market attractiveness, drawing on employment evidence from the Economic Development Needs Assessment (EDNA) and Black Country Employment Area Review (BEAR) underpinning the Draft Plan.

The categorisation has been made as follows:

<b>Green</b>	Suitable for employment use
<b>Amber</b>	-
<b>Red</b>	Not suitable for employment use

#### *Employment Land*

Where existing employment land is being assessed for housing use, the findings of the EDNA and BEAR are referred to where appropriate.

The categorisation has been made as follows:

<b>Green</b>	Surplus to employment needs
<b>Amber</b>	-
<b>Red</b>	Retain for employment

#### *Delivery / Phasing*

Site specific findings from the Black Country Viability and Delivery Study (2021) form part of the assessment and any known issues identified through submission details or meetings with developers.

The categorisation has been made as follows:

<b>Green</b>	All capacity deliverable during Plan period
<b>Amber</b>	Part of capacity not deliverable during Plan period
<b>Red</b>	Site not deliverable during Plan period

#### *Viability*

Site specific findings from the Black Country Viability and Delivery Study (2021) form part of the assessment, and any known issues identified through submission details or meetings with developers and any issues identified through Council records.

The categorisation has been made as follows:

<b>Green</b>	Viable with Draft Plan obligations
<b>Amber</b>	Marginal viability requiring reduced Draft Plan obligations
<b>Red</b>	Significant capacity limitations / likely to make development unviable without external funding

### **Availability of Utilities – Electricity, Gas, Water, Sewage Treatment**

An assessment based on information provided by submitters and utility providers, the findings of the Utilities Infrastructure Capacity Study (2019) and Water Cycle Study (2020), and the findings of the site visit.

Water utilities companies have a statutory duty to supply water to, and remove waste water from, new development sites and a lack of available capacity does not prevent future development. If capacity is not currently available either existing infrastructure will need to be upgraded or new infrastructure will need to be provided. The infrastructure upgrades required will depend on the amount and location of growth falling within each water catchment area.

The categorisation has been made as follows:

<b>Green</b>	No limitations / negligible impact on development viability
<b>Amber</b>	Some capacity limitation / no significant limits on development viability
<b>Red</b>	Significant capacity limitations / likely to make development unviable

### **Infrastructure Constraints on / under Site**

Such constraints could include electric cables/sub-stations, water/sewage pipes, gas pipes, pylons, culverts and rights of way. Council records and site visit used to determine constraints and provide assessment.

The categorisation has been made as follows:

<b>Green</b>	No limitations / negligible impact on development viability
<b>Amber</b>	Some capacity limitation / no significant limits on development viability
<b>Red</b>	Significant capacity limitations / likely to make development unviable

### **Highway Access and Transportation**

Officer assessment of whether suitable highway access and infrastructure can be achieved for housing or employment uses. Consideration given to safe access for vehicles and pedestrians. Barriers to access could include a reliance on land outside the site assessment boundary without a proven willing landowner.

The categorisation has been made as follows:

<b>Green</b>	No / negligible access constraint
<b>Amber</b>	Access constraints / highway safety impact which can be viably overcome
<b>Red</b>	Access constraints / severe highway safety impact which cannot be viably overcome

### **Impact on Wider Road Network**

Consideration of wider highway constraints such as infrastructure and highway capacity.

The categorisation has been made as follows:

<b>Green</b>	No / negligible impact
<b>Amber</b>	Likely to have unacceptable impacts which can be adequately mitigated
<b>Red</b>	Likely to have unacceptable impacts which cannot be adequately mitigated



## 4) Social

### *Access Time by Walking or Public Transport to Key Residential Services*

This section uses accessibility mapping and site visit assessments to determine how accessible the site is in relation to primary and secondary schools, health centres, strategic centres, employment areas and food stores, in order to meet the requirements of Draft BCP Policy HOU2. Food stores used for the accessibility mapping were above 1000m<sup>2</sup> - for smaller or well-connected sites a site visit determined whether existing smaller provision was available in closer proximity. Times quoted are walking or public transport distance, except for Primary Schools, which is walking distance only.

The NPPF (para 138) states that, "...Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. ..."

The categorisation has been made as follows:

	<b>Green</b>	<b>Amber</b>	<b>Red</b>
<b>Primary School</b>	Within 10 mins following any viable mitigation	Within 15 mins following any viable mitigation	Over 15 mins following any viable mitigation
<b>Secondary School</b>	Within 20 mins following any viable mitigation	Within 25 mins following any viable mitigation	Over 25 mins following any viable mitigation
<b>GP / Health Centre / Walk in centre</b>	Within 10 mins following any viable mitigation	Within 15 mins following any viable mitigation	Over 15 mins following any viable mitigation
<b>Strategic Centre/ Employment Area</b>	Within 20 mins following any viable mitigation	Within 30 mins following any viable mitigation	Over 30 mins following any viable mitigation
<b>Centre / Foodstore</b>	Within 10 mins following any viable mitigation	Within 15 mins following any viable mitigation	Over 15 mins following any viable mitigation

### *Housing Density Location / Character Constraints on Density*

The accessibility mapping (as set out above) was used to determine the appropriate housing density for the site, in line with Draft BCP Policy HOU2. This was then informed by an assessment of local character and any other constraints which were considered could influence appropriate housing density.

### **Connections to Local Cycle Route Network**

Council records to inform an assessment to identify sustainable cycle routes to indicate existing benefits or where improvements could be made.

The categorisation has been made as follows:

<b>Green</b>	Direct connection to site
<b>Amber</b>	Offsite works required to create connection to site
<b>Red</b>	-

### **Public Open Space**

Council records and the most recent local Open Space Assessment / Strategy were used to determine if part or all of the site functions as public open space, whether the open space is surplus against local standards and if suitable mitigation for loss can be achieved.

The categorisation has been made as follows:

<b>Green</b>	Site is not public open space or is public open space which is surplus to local needs with no mitigation necessary
<b>Amber</b>	Site is public open space required to meet local need but part retention / adequate mitigation possible
<b>Red</b>	Site is public open space required to meet local need and not possible to mitigate loss

### **Loss of Playing Field / Sports Pitches**

Council records, site visit and the most recent local Playing Pitch Assessment / Strategy were used to determine if part or all of the site functions as playing field or sports pitch and if suitable mitigation for loss can be achieved.

The categorisation has been made as follows:

<b>Green</b>	Site is not playing field or is playing field which is surplus to local needs with no mitigation necessary
<b>Amber</b>	Site is playing field required to meet local need but part retention / adequate mitigation possible
<b>Red</b>	Site is playing field required to meet local need and not possible to mitigate loss

### **Other Social**

For some sites, or clusters of sites, a shortage of school places has been identified which is likely to need to be addressed through off-site contributions to expand local school place provision. In some cases, the potential need for a new school is identified, which may be provided on site.

## **5) Other**

### ***Opportunities***

An assessment of whether development resolves existing issues or whether the site has a favourable relationship with adjoining sites.

### ***Sustainability Appraisal Conclusion***

The key findings of the Sustainability Appraisal of the Draft BCP relating to the site.

### ***Conclusion***

A summary of the key considerations affecting the site. An explanation of why the site has been selected as suitable for development or the key reasons why the site has not been selected as suitable for development. If the site has been selected as suitable for development, a statement of the appropriate uses for and capacity of the site, given constraints and infrastructure requirements.

## 5. List of Abbreviations

It is appreciated that there are a number of technical terms and acronyms which may not be familiar to all readers. This list aims to assist readers in understanding the terminology used throughout this document and the appendices.

AHHTV	Area of High Historic Townscape Value
BCCS	Black Country Core Strategy
BCP	Black Country Plan
BEAR	Black Country Employment Area Review
CA	Conservation Area
CfS	Call for Site
DPH	Dwellings per Hectare
EDNA	Economic Development Needs Assessment
ELV	End of Life Vehicle
ERDF	European Regional Development Fund
GB	Green Belt
GP	General Practitioner
Ha	Hectares
HER	Historic Environment Records
HLC	Historic Landscape Characterisation
LGS	Local Green Space
LNR	Local Nature Reserve
PRoW	Public Right of Way
PT	Public Transport
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SINC	Site of Importance for Nature Conservation
SLINC	Site of Local Importance for Nature Conservation
SSSI	Site of Special Scientific Interest
SUDs	Sustainable Urban Drainage Systems
TPO	Tree Preservation Order