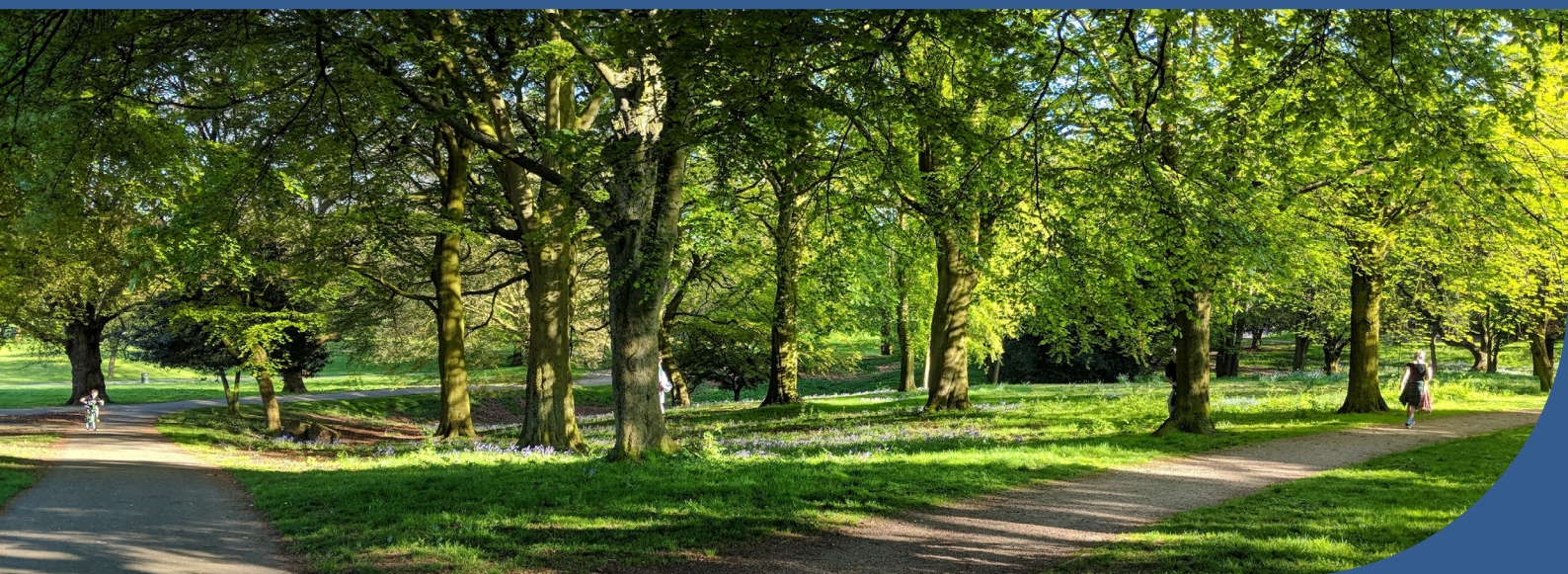


Sustainability Appraisal of the Sandwell Local Plan 2024–2041

Addendum to the Regulation 19 SA to support the Examination of the SLP

April 2025



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Sandwell Local Plan 2024–2041

Addendum to the Regulation 19 SA Report to support the Examination of the SLP

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Contents

1	Introduction	1
1.1	Purpose of this report	1
1.2	The SA process to date	1
1.3	Legislative context	2
1.4	How to read and understand this document	3
2	Summary methodology	4
2.1	Introduction	4
2.2	The SA Framework	4
2.3	Appraisal process	6
2.4	Significant effects	7
2.5	Limitations of predicting effects	8
3	Main Modification One – Proposed additional site allocation	10
3.1	Overview	10
3.2	SA Objective 1: Cultural Heritage	11
3.3	SA Objective 2: Landscape	12
3.4	SA Objective 3: Biodiversity	12
3.5	SA Objective 4: Climate change mitigation	14
3.6	SA Objective 5: Climate Change Adaptation	15
3.7	SA Objective 6: Natural Resources	16
3.8	SA Objective 7: Pollution	16
3.9	SA Objective 8: Waste	17
3.10	SA Objective 9: Transport and Accessibility	18
3.11	SA Objective 10: Housing	19
3.12	SA Objective 11: Equality	19
3.13	SA Objective 12: Health	20
3.14	SA Objective 13: Economy	21
3.15	SA Objective 14: Education, Skills and Training	22
3.16	Conclusion	23
3.17	Post-mitigation	23
3.18	Selection and rejection	24
4	Main Modification Two – Policy SCC4	25
4.1	Overview	25
4.2	Assessment of modified policy	25
5	Main Modification Three – Policy SNE2	27
5.1	Overview	27
5.2	Assessment of modified policy	27
6	Conclusion	31
6.1	Conclusion	31
6.2	Next steps	31

Figures

Figure 3.1: Site location plan showing the proposed residential allocation in orange and the retained Alsopp's Hill SLINC in striped green (extracted from SLP Main Modifications Document) 10

Tables

Table 2.1: Summary of the SA Objectives	5
Table 2.2: Guide to scoring significant effects	7
Table 3.1: Site impact matrix for SA Objective 1 – Cultural heritage	12
Table 3.2: Site impact matrix for SA Objective 2 – Landscape	12
Table 3.3: Site impact matrix for SA Objective 3 – Biodiversity	14
Table 3.4: Site impact matrix for SA Objective 4 – Climate change mitigation	15
Table 3.5: Site impact matrix for SA Objective 5 – Climate change adaptation	15
Table 3.6: Site impact matrix for SA Objective 6 – Natural resources	16
Table 3.7: Site impact matrix for SA Objective 7 – Pollution	17
Table 3.8: Site impact matrix for SA Objective 8 – Waste	18
Table 3.9: Site impact matrix for SA Objective 9 – Transport and accessibility	19
Table 3.10: Site impact matrix for SA Objective 10 – Housing	19
Table 3.11: Site impact matrix for SA Objective 11 – Equality	20
Table 3.12: Site impact matrix for SA Objective 12 – Economy	21
Table 3.13: Site impact matrix for SA Objective 13 – Economy	22
Table 3.14: Site impact matrix for SA Objective 14 – Education, skills and training	22
Table 3.15: Summary of pre-mitigation site assessment	23
Table 3.16: Summary of post-mitigation site assessment	24
Table 4.1: Policy matrix for proposed modification to Policy SCC4	26
Table 5.1: Policy matrix for proposed modification to Policy SNE2	30

Boxes

Box 2.1: Schedule 1 of the SEA Regulations	6
Box 3.1: SMBC's outline reasons for selecting the reasonable alternative site at Rowley Regis Golf Course	24
Box 4.1: Proposed modification to Policy SCC4	25
Box 5.1: Proposed modification to Policy SNE2	27

1 Introduction

1.1 Purpose of this report

1.1.1 Lepus Consulting Ltd (Lepus) has been instructed by Sandwell Metropolitan Borough Council (SMBC) to undertake a Sustainability Appraisal (SA) process, incorporating the requirements of Strategic Environmental Assessment (SEA), for the Sandwell Local Plan (SLP) 2024-2041.

1.1.2 Following Submission of the SLP to the Secretary of State for independent examination on 11th December 2024¹, SMBC has proposed three potential main modifications to the SLP which are considered necessary to ensure that the SLP is found sound at examination:

- The proposed allocation of part of Rowley Regis Golf Course, Tippity Green, Rowley Regis, B66 9EJ for housing development.
- Changes to the wording of Policy SCC4 – Embodied Carbon and Waste.
- The removal of Hill House Farm as a potential Habitat Bank for Biodiversity Net Gain (BNG) and the inclusion of Hill Farm Bridge Fields and Ray Hall Pastoral Land.

1.1.3 This SA document has been prepared to evaluate the three proposed modifications to the Regulation 19 Publication Version of the SLP² and forms an Addendum to the Regulation 19 SA Report published in September 2024³. The Regulation 19 SLP and evidence, including the SA, were subject to consultation between 23rd September and 11th November 2024.

1.1.4 This SA Addendum will be subject to consultation alongside the SLP Proposed Main Modifications Consultation Document under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 between 28th April and 9th June 2025.

1.2 The SA process to date

1.2.1 This SA Addendum forms the latest stage of a series of reports that have been prepared to document the iterative SA process. Such an approach enables the Council to demonstrate that it has identified, described and evaluated reasonable alternatives during the making of the Local Plan. To date, this has included:

¹ SMBC (2024) Publication Sandwell Local Plan. Available at: <https://www.sandwell.gov.uk/planning/sandwell-local-plan> [Date accessed: 17/04/25]

² SMBC (2025) Sandwell Local Plan – Proposed Main Modifications Consultation Document (Regulation 19)

³ Lepus Consulting (2024) Sustainability Appraisal of the Sandwell Local Plan 2024-2041: Regulation 19 SA Report Volume 1-3. September 2024. Available at: <https://www.sandwell.gov.uk/downloads/download/991/sandwell-local-plan-reg19-consultation-documents> [Date accessed: 17/04/25]

- The **SA Scoping Report** (January 2023)⁴ set the criteria for assessment, established the baseline data and provided an overview of key sustainability issues.
- The **Regulation 18 (I) Issues and Options SA Report** (January 2023)⁵ included an evaluation of the vision and draft objectives of the SLP and set out recommendations for SMBC to consider in the SLP process.
- The **Regulation 18 (II) Draft Plan SA Report** (October 2023)⁶ set out the appraisal of reasonable alternatives for the overall distribution of housing, employment and Gypsy and Traveller growth in the Plan area, as well as reasonable alternative development sites and draft policies.
- The **Regulation 19 SA Report** (September 2024)⁷ included a summary of the SA process to date and was prepared to meet the requirements of an SEA Environmental Report. It also included the evaluation of four additional reasonable alternative sites that had come forward since the Regulation 18 (II) Consultation.

1.3 Legislative context

1.3.1 The SEA Directive applies to a wide range of public plans and programmes, including land use plans (see Article 3(2)) of the SEA Directive⁸). The Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations, SI no. 1633⁹). Its purpose is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes, with a view to promoting sustainable development.

1.3.2 SEA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making. The SEA Directive and SEA Regulations require an environmental report in which the likely significant effects on the environment are identified for local plan proposals and reasonable alternatives.

⁴ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan: Scoping Report. Available at: <https://www.sandwell.gov.uk/downloads/file/896/sandwell-local-plan-issues-and-options-sustainability-appraisal-scoping-report> [Date accessed: 17/04/25]

⁵ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Issues and Options, January 2023. Available at: <https://www.sandwell.gov.uk/downloads/file/893/sandwell-local-plan-issues-and-options-sustainability-appraisal> [Date accessed: 17/04/25]

⁶ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 17/04/25]

⁷ Lepus Consulting (2024) Sustainability Appraisal of the Sandwell Local Plan 2024-2041: Regulation 19 SA Report Volume 1-3. September 2024. Available at: <https://www.sandwell.gov.uk/downloads/download/991/sandwell-local-plan-reg19-consultation-documents> [Date accessed: 17/04/25]

⁸ Directive 2001/42/EC of the European Parliament of the Council of 27 June 2001 (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Date accessed: 17/04/25]

⁹ The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/ukSI/2004/1633/contents/made> [Date accessed: 17/04/25]

1.3.3 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is required by S19 (5) of the Planning and Compulsory Purchase Act 2004 and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012. The role of SA is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

1.3.4 Planning Practice Guidance (PPG) on SEA and SA¹⁰ states: “*Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the ‘Strategic Environmental Assessment Regulations’). Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues*”.

1.4 How to read and understand this document

1.4.1 This report should be read alongside the Regulation 19 Publication Version (2024) of the SLP and the Regulation 19 SA (2024).

1.4.2 The contents of this SA Report are as follows:

- **Chapter 1** (this chapter) provides an overview of the purpose of this SA Addendum, the SA process to date, and the requirement for SA and SEA;
- **Chapter 2** provides a summary of the methodology used in the SA process for context (see the Regulation 19 SA report for the full methodology);
- **Chapter 3** provides an evaluation of the additional site allocation at Rowley Regis Golf Course;
- **Chapter 4** provides an evaluation of the proposed modification to Policy SCC4 – Embodied Carbon and Waste;
- **Chapter 5** provides an evaluation of the proposed modification to Policy SNE2 – Protection and Enhancement of Wildlife Habitats; and
- **Chapter 6** provides an overview of the conclusions of the SA Addendum and outlines the next steps for the SLP.

¹⁰ MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 17/04/25]

2 Summary methodology

2.1 Introduction

- 2.1.1 This chapter provides a brief overview of the methodology used to inform the identification and assessment of potential effects in the SA process.
- 2.1.2 The detailed SA methodology is provided in the SA reports which accompanied the previous stages of Local Plan preparation.
- 2.1.3 The sustainability appraisal process uses objective geographic information relating to environmental receptors, the SA Framework (as defined in the SA Scoping Report¹¹) and established standards (where available) to help make the assessment decisions transparent and robust.

2.2 The SA Framework

- 2.2.1 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations¹².
- 2.2.2 The SA Objectives and the SEA topics to which they relate are set out in **Table 2.1**.
- 2.2.3 Each SA Objective is considered when appraising SLP site allocations, policies and reasonable alternatives. The order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to give focus for each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.

¹¹ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan: Scoping Report. Available at: <https://www.sandwell.gov.uk/downloads/file/896/sandwell-local-plan-issues-and-options-sustainability-appraisal-scoping-report>
[Date accessed: 17/04/25]

¹² Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including “issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).”

Table 2.1: Summary of the SA Objectives

	SA Objectives	Relevance to SEA Regulations – Schedule 2
1	Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	Cultural heritage
2	Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.	Landscape, cultural heritage
3	Biodiversity, flora, fauna and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	Biodiversity, flora and fauna
4	Climate change mitigation: Minimise Sandwell's contribution to climate change.	Climatic factors
5	Climate change adaptation: Plan for the anticipated levels of climate change.	Climatic factors, soil and water
6	Natural resources: Protect and conserve natural resources.	Soil, water and material assets
7	Pollution: Reduce air, soil, water and noise pollution.	Air, water, soil and human health
8	Waste: Reduce waste generation and disposal and achieve the sustainable management of waste.	Population and material assets
9	Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	Climatic factors, population and material assets
10	Housing: Provide affordable, environmentally sound and good quality housing for all.	Population
11	Equality: Reduce poverty, crime and social deprivation and secure economic inclusion.	Population and human health
12	Health: Safeguard and improve community health, safety and wellbeing.	Human health and population
13	Economy: Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	Population and material assets
14	Education, skills and training: Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	Population

2.3 Appraisal process

2.3.1 The purpose of this document is to provide an appraisal of the proposed modifications to the SLP in line with Regulation 12 of the SEA Regulations¹³ which states that:

2.3.2 *“Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”.*

2.3.3 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 3.1**).

Box 2.1: Schedule 1 of the SEA Regulations¹⁴

Criteria for determining the likely significance of effects (Schedule 1 of SEA Regulations)

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets out a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

¹³ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 17/04/25]

¹⁴ Ibid

2.4 Significant effects

- 2.4.1 A single value from **Table 2.2** has been allocated to each SA Objective for each reasonable alternative, site allocation or policy evaluated in the SA process. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process.
- 2.4.2 The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations¹⁵, where feasible, which states that the effects should include: “*secondary, cumulative, synergistic, short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*”.

Table 2.2: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	<ul style="list-style-type: none"> • The size, nature and location of development proposals would be likely to: • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is uncertain whether impacts would be positive or adverse.
Minor Positive +	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

¹⁵ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date accessed: 17/04/25]

- 2.4.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects in terms of the relevant SA Objective, the precautionary principle¹⁶ has been used. This is a worst-case scenario approach; if a positive effect is identified in relation to one criterion and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts provide only an indicative summary, and the accompanying assessment text provides a fuller explanation of the sustainability performance of the option.
- 2.4.4 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).
- 2.4.5 Significance of effect has been categorised as minor or major. **Table 2.2** sets out the significance matrix and explains the terms used. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 2.4.6 It is important to note that the assessment scores presented in **Table 2.2** are high level indicators. The assessment narrative text should always read alongside the significance scores. Likely impacts are not intended to be summed.
- 2.4.7 A number of topic-specific methodologies and assumptions have been applied to the appraisal process for reasonable alternative sites, allowing evaluation of sustainability performance against receptors within each SA Objective and increasing granularity in reporting. The site assessment methodology is presented in Appendix D of the Regulation 19 SA Report¹⁷. The same methodology has been applied in the assessment of the proposed new site (**Chapter 3**).

2.5 Limitations of predicting effects

- 2.5.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.
- 2.5.2 The assessments in this report are based on the best available information, including that provided to Lepus by the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.

¹⁶ The European Commission describes the precautionary principle as follows: “If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered”.

¹⁷ Lepus Consulting (2024) Sustainability Appraisal of the Sandwell Local Plan 2024-2041: Regulation 19 SA Report Volume 3 of 3: Appendices. September 2024. Available at: <https://www.sandwell.gov.uk/downloads/file/3209/slp-reg-19-sustainability-appraisal-vol-3-appendices-september-2024-> [Date accessed: 17/04/25]

- 2.5.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way and any introduction of site-based detail should be made clear in the SA report, as new data could potentially introduce bias and skew the findings of the assessment process.
- 2.5.4 The assessment of development proposals is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available. Additionally, the appraisal of the SLP is limited in its assessment of carbon emissions, and greater detail of carbon data would help to better quantify effects.
- 2.5.5 All data used is secondary data obtained from the Council or freely available on the internet.

3 Main Modification One – Proposed additional site allocation

3.1 Overview

3.1.1 The proposed main modification seeks to allocate 10.3 hectares of land at Rowley Regis Golf Course for housing development. The site is capable of accommodating approximately 250 new homes. The location of the site is shown in **Figure 3.1**.

3.1.2 As explained in **Chapter 2**, the methodology used to evaluate the additional site is consistent with that used to evaluate all reasonable alternative sites in the SA process to date. Appendix D of the Regulation 19 SA Report¹⁸ outlines the assessment receptors, data sources and assumptions applied in the evaluation of reasonable alternative sites.

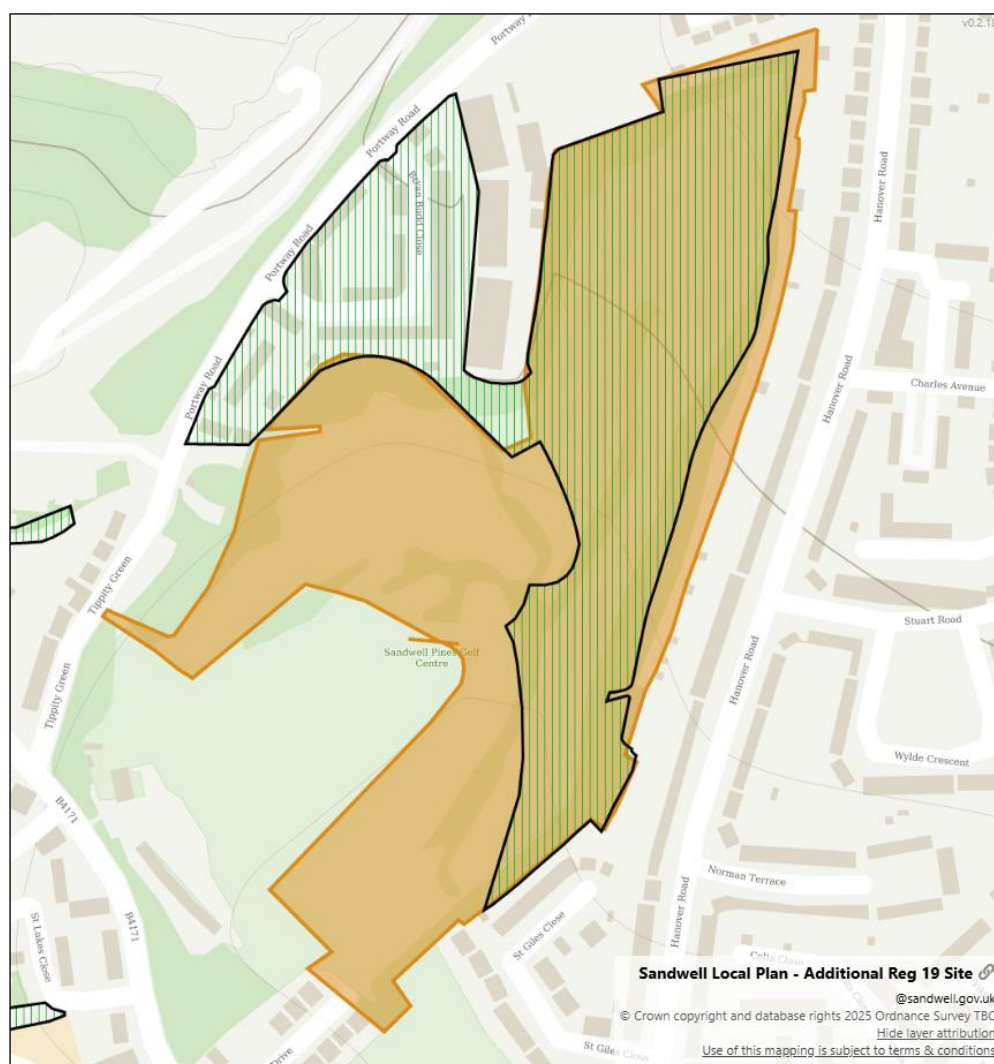


Figure 3.1: Site location plan showing the proposed residential allocation in orange and the retained Alsopp's Hill SLINC in striped green (extracted from SLP Main Modifications Document)

¹⁸ Lepus Consulting (2024) Sustainability Appraisal of the Sandwell Local Plan 2024-2041: Regulation 19 SA Report Volume 3 of 3: Appendices. September 2024. Available at: <https://www.sandwell.gov.uk/downloads/file/3209/slp-reg-19-sustainability-appraisal-vol-3-appendices-september-2024-> [Date accessed: 17/04/25]

3.2 SA Objective 1: Cultural Heritage

Grade I Listed Building

- 3.2.1 There are two Grade I Listed Buildings in Sandwell, 'West Bromwich Manor House' and 'Galton Bridge', and several others nearby in surrounding authority areas. The proposed development at the site is not anticipated to impact Grade I Listed Buildings given the distance from the site to the nearest listed building. A negligible impact is identified.

Grade II* Listed Building

- 3.2.2 There are eight Grade II* Listed Buildings within Sandwell, mostly concentrated in and around the Smethwick area in the south east of the borough. The proposed development at the site is not anticipated to impact Grade II* Listed Buildings given the distance from the site to the nearest listed building. A negligible impact is identified.

Grade II Listed Building

- 3.2.3 Throughout Sandwell, a significant number of Grade II Listed Buildings can be found, often concentrated in developed areas, adjacent to the canal network, and most notably within the historic centres of West Bromwich and Oldbury. The site is located approximately 180 metres from the Grade II Listed 'Saint Giles Church, Rowley Regis'. However, the presence of intervening built development and mature vegetation effectively screens the site from the heritage asset. As a result, the proposal is considered to have a negligible impact on the setting and significance of the listed building.

Conservation Area

- 3.2.4 Sandwell contains nine Conservation Areas, the majority of which cover sections of the urban area, as well as portions of the canal network, historic open spaces and nature reserves. Proposed development at the site is unlikely to have a significant impact on the setting of a Conservation Area, as such a negligible impact is identified.

Scheduled Monument

- 3.2.5 There are eight Scheduled Monuments (SMs) within Sandwell, generally covering previously developed areas in relation to Birmingham Canal or areas with industrial history. The proposed development at the site is unlikely to significantly impact the setting of an SM; a negligible impact is identified.

Registered Park and Garden

- 3.2.6 Five Registered Parks and Gardens (RPGs) can be found within Sandwell: 'Brunswick Park', 'Victoria Park (Tipton)', 'Dartmouth Park', 'Warley Park' and a small proportion of 'Great Barr Hall'. The site is deemed unlikely to have a significant impact on the setting of any RPG given the distance from the site to the nearest RPG; as such, a negligible impact is identified.

Archaeological Priority Area

- 3.2.7 Archaeological Priority Areas (APAs) have been identified throughout Sandwell's urban and undeveloped areas. The site is not located in close proximity to APAs, and therefore, the proposed development at the site will be likely to have a negligible impact on the setting of APAs.

Historic Landscape Characterisation

- 3.2.8 The Black Country Historic Landscape Characterisation (HLC) Study¹⁹ has identified a range of Historic Environment Area Designations within the Black Country, covering a large proportion of Sandwell's parkland and Green Belt as well as a number of features within the urban areas. The site does not coincide with any identified areas of high historic value, and therefore, the proposed development will be expected to have a negligible impact on the local historic environment.

Table 3.1: Site impact matrix for SA Objective 1 – Cultural heritage

Site Name	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	SM	RPG	APA	HLC
Rowley Regis Golf Course	0	0	0	0	0	0	0	0

3.3 SA Objective 2: Landscape

Landscape Sensitivity

- 3.3.1 The Black Country Landscape Sensitivity Assessment²⁰ identified the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. In Sandwell, Green Belt is restricted to the north east of the borough, at Sandwell Valley. The site is located outside of the Green Belt, and as such outside of the Landscape Sensitivity Assessment study area. Therefore, the potential effects of the site on sensitive landscapes are uncertain.

Table 3.2: Site impact matrix for SA Objective 2 – Landscape

Site Name	Landscape Sensitivity
Rowley Regis Golf Course	+/-

3.4 SA Objective 3: Biodiversity

European sites

- 3.4.1 European sites are a network of nature protection areas which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). There are no European sites within Sandwell, with the nearest being 'Fens Pools' SAC located approximately 3km to the west, in Dudley. No Zone of Influence has been identified for 'Fens Pools' SAC to indicate areas where development could potentially result in significant adverse effects on its designated features, and therefore, at the time of writing the impact of the site on European sites is uncertain.

¹⁹ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf [Date accessed: 17/04/25]

²⁰ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 17/04/25]

Sites of Special Scientific Interest

- 3.4.2 There are no Sites of Special Scientific Interest (SSSIs) within Sandwell Borough, however nearby SSSIs include 'The Leasowes' and 'Doulton's Claypit' in the neighbouring borough of Dudley. The site is located within an Impact Risk Zone (IRZ) which does not indicate the proposed use as a threat to nearby SSSIs, and as such, the proposed development at the site will be likely to have a negligible impact on SSSIs.

National Nature Reserves

- 3.4.3 There are no National Nature Reserves (NNRs) within Sandwell, with 'Wren's Nest' and 'Saltwells' NNRs in Dudley being the closest to the borough, located at their closest points approximately 800m and 700m to the west of Sandwell, respectively. The site is not located in close proximity to a NNR and therefore the proposed development will be unlikely to have a significant impact on NNRs.

Ancient Woodland

- 3.4.4 In Sandwell, there are some small areas of ancient woodland including 'Codsall Coppice' and 'Warley Rack Wood' in the south of the borough, and 'Dartmouth Golf Wood' and 'Chambers Wood' towards the north east. The site is not located in close proximity to these areas of ancient woodland and therefore the proposed development at the site will be unlikely to have a significant impact on any ancient woodland.

Local Nature Reserves

- 3.4.5 There are nine Local Nature Reserves (LNR) within Sandwell, found within both the urban areas and Green Belt, including 'Sheepwash', 'Merrion Wood' and 'Sot's Hole with Bluebell Wood' LNRs. The site is not located in close proximity to a LNR and therefore the proposed development will be unlikely to have a significant impact on LNRs.

Sites of Importance for Nature Conservation

- 3.4.6 Within Sandwell, there are 33 Sites of Importance for Nature Conservation (SINCs). The site is not located in close proximity to a SINC and therefore the proposed development will be unlikely to have a significant impact on SINCs.

Sites of Local Importance for Nature Conservation

- 3.4.7 There are 71 Sites of Local Importance for Nature Conservation (SLINCs) found throughout Sandwell, but particularly in the south west and north east of the borough. A large proportion (46.5%) of the site coincides with 'Alsopp's Hill' SLINC. The proposed development of 250 dwellings at the site could potentially have a minor negative impact on the SLINC through loss or degradation of this local biodiversity asset.

Geological Sites

- 3.4.8 Geological sites have been identified throughout the Plan area, which form part of the Black Country Global Geopark²¹. These sites include a range of notable geological features and formations, including a number of SSSIs and SINC. Within Sandwell, there are five geological sites found in the east and south west of the borough, including 'The Rowley Hills', 'Blue Rock Quarry SINC' and 'Bumble Hole & Warren's Park LNR'. The proposed development the site will be likely to have a negligible impact on geological sites as the site does not coincide with any identified areas of geological importance.

Priority Habitat

- 3.4.9 Some small extents of priority habitats are found throughout the Sandwell area, particularly concentrated in the Green Belt to the north east and include 'coastal and floodplain grazing marsh', 'good quality semi-improved grassland' and 'deciduous woodland'. The site does not coincide with any identified priority habitat; therefore, the proposed development is likely to have a negligible impact on the overall presence of priority habitats across the borough.

Table 3.3: Site impact matrix for SA Objective 3 – Biodiversity

Site Name	European Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRs	SINCs	SLINCs	Geological Sites	Priority Habitats
Rowley Regis Golf Course	+/-	0	0	0	0	0	-	0	0

3.5 SA Objective 4: Climate change mitigation

Potential Increase in Carbon Footprint

- 3.5.1 The estimated carbon dioxide (CO₂) emissions for Sandwell in 2022 (the latest available data when the Regulation 19 SA was prepared) was 1,247.3 kilotonnes, with per capita emissions of 3.6 tonnes, according to UK local authority CO₂ emissions data²². Sandwell has an average of 2.7 people per dwelling²³.
- 3.5.2 Based on these figures, and assuming new residents will generate CO₂ emissions in line with the current average, it has been calculated that proposals for 1,283 homes or more are expected to increase carbon emissions by 1% or more in comparison to the current estimates for Sandwell. Proposals for 128 homes or more are expected to increase carbon emissions by 0.1% or more in comparison to current estimates for Sandwell.

²¹ Black Country Geopark (2025) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcq/> [Date accessed: 17/04/25]

²² Department for Energy Security and Net Zero (2024) UK local authority and regional greenhouse gas emissions statistics, 2005 to 2022. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2022> [Date accessed: 17/04/25]

²³ People per dwelling has been calculated using the ONS mid-2021 population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>) and dwelling stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

- 3.5.3 Residential-led development is likely to result in an increase in carbon emissions, to some extent. The site proposes the development of 250 dwellings and therefore a minor negative impact on Sandwell's carbon emissions will be expected.

Table 3.4: Site impact matrix for SA Objective 4 – Climate change mitigation

Site Name	Potential increase in carbon footprint
Rowley Regis Golf Course	-

3.6 SA Objective 5: Climate Change Adaptation

Flood Zones

- 3.6.1 Flood Zones 2 and 3 occur alongside watercourses throughout the borough, such as the River Tame, with the majority of areas at risk of fluvial flooding found towards the north. The site is located wholly within Flood Zone 1 and therefore will be expected to have a minor positive impact on flooding, as the proposed development at the site will be likely to locate site end users away from areas at risk of fluvial flooding.

Indicative Flood Zone 3b

- 3.6.2 Indicative Flood Zone 3b is present in areas where flooding will potentially worsen in the future due to climate change, areas of which are scattered throughout Sandwell generally covering areas currently within Flood Zone 3a according to the Black Country Level 1 Strategic Flood Risk Assessment (SFRA)²⁴ which was the most up-to-date SFRA at the time of preparing the Regulation 19 SA (now superseded by Sandwell Level 1 SFRA²⁵). The site is not located within Flood Zone 3b, and therefore it is likely the proposed development will result in a negligible impact on contributing to flooding issues in the future, although further site-specific assessments would help to provide a more accurate picture of changing flood risk due to climate change.

Surface water flood risk

- 3.6.3 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. Areas affected by surface water flooding can be found throughout Sandwell, in particular along roads, as well as within urban parkland, and associated with ponds and watercourses. Small proportions of low surface water flood risk are scattered throughout the site, and insignificant areas of medium and high risk. The proposed development at the site is anticipated to result in a minor negative impact on surface water flooding.

Table 3.5: Site impact matrix for SA Objective 5 – Climate change adaptation

Site Name	Fluvial Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
Rowley Regis Golf Course	+	0	-

²⁴ JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25th June 2020. Available at: <https://www.sandwell.gov.uk/downloads/download/487/sandwell-local-plan-water-and-flooding-evidence> [Date accessed: 17/04/25]

²⁵ JBA Consulting (2024) Sandwell Level 1 Strategic Flood Risk Assessment. Available at: <https://www.sandwell.gov.uk/downloads/download/487/sandwell-local-plan-water-and-flooding-evidence> [Date accessed: 17/04/25]

3.7 SA Objective 6: Natural Resources

Previously Undeveloped Land / Land with Environmental Value

- 3.7.1 Sandwell is largely built-up, although it also contains a range of large green spaces distributed throughout the borough and a small proportion of undeveloped Green Belt land in the north east. The site comprises 10.3ha of land, which was historically quarried and used for landfill, following which it was landscaped and currently comprises a golf course. In line with the National Planning Policy Framework (NPPF) definition the site is therefore classed as undeveloped land²⁶. The site area contains features that are likely to be of environmental value such as hedgerows, trees and scrub associated with the current golf course land use that would potentially be lost upon development. The proposed development at the site is identified to have a minor negative impact on natural resources due to the potential loss of ecologically or environmentally valuable soil resources.

BMV Land

- 3.7.2 The land within Sandwell Borough is almost entirely 'Urban' according to the Agricultural Land Classification (ALC), with a small proportion of 'Non-Agricultural' and Grade 4 land in the north east. The site wholly comprises previously undeveloped land and will be likely to have a minor positive impact on natural resources due to the site being located upon areas of less agriculturally important 'Urban' land, helping to prevent loss of 'best and most versatile' (BMV) land across the borough.

Table 3.6: Site impact matrix for SA Objective 6 – Natural resources

Site Name	Previously Undeveloped Land / Land with Environmental Value	BMV Land
Rowley Regis Golf Course	-	+

3.8 SA Objective 7: Pollution

Air Quality Management Area

- 3.8.1 The entirety of Sandwell Borough is classed as 'Sandwell Air Quality Management Area' (AQMA). The site is wholly located within this AQMA. The proposed development at the site will be likely to locate site end users in areas of existing poor air quality, as such a minor negative impact on air pollution is identified.

Main road

- 3.8.2 Many major roads pass through Sandwell, including the A34, A4041, M5, and the M6 Motorway. The site is located over 200m from a main road. The proposed development at the site will be expected to have a negligible impact on exposure of site end users to transport associated air and noise pollution associated with main roads.

²⁶ NPPF Annex 2: Glossary. Available at: <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary#prev-dev-land> [Date accessed: 22/04/25]

Watercourse

- 3.8.3 There are several watercourses within Sandwell, including the River Tame and various canals and brooks. The site is located over 10m from a watercourse and is less likely to result in significant impacts on the quality of watercourses. However, the site would need to be evaluated according to land use type, size of development and exact location. The proposed development at the site has the potential to lead to adverse impacts such as those resulting from runoff. The potential effect of the site on water quality is uncertain.

Groundwater Source Protection Zone

- 3.8.4 Source Protection Zones (SPZs) for groundwater within Sandwell are located only within the south east of the borough. SPZs are grouped from 1 to 3 based on the level of protection that the groundwater requires. The site does not coincide with the catchment of any SPZ; therefore, the proposed development at the site will be expected to have a negligible impact on quality or status of groundwater.

Potential Increase in Air Pollution

- 3.8.5 The construction and occupation of 250 dwellings proposed at the site could potentially result in significant increase in local air pollution. A major negative impact is identified. This includes potential impacts associated with traffic generated as a result of the proposed development; further site-specific assessment would help to better quantify this effect.

Table 3.7: Site impact matrix for SA Objective 7 – Pollution

Site Name	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
Rowley Regis Golf Course	-	0	+/-	0	--

3.9 SA Objective 8: Waste

Potential Increase in Household Waste Generation

- 3.9.1 Residential-led development is likely to result in an increase in household waste generation, to some extent. According to the UK local authority household waste data²⁷, approximately 132,228 tonnes of waste was produced within Sandwell in 2022/2023 (the latest available data when the Regulation 19 SA was prepared). It is assumed that new residents in Sandwell will have an annual waste production of 377kg per person, in line with the England average²⁸. Sandwell has an average of 2.7 people per dwelling²⁹.

²⁷ DEFRA (2024) Local Authority Collected Waste Statistics. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results>. [Date accessed: 17/04/25]

²⁸ DEFRA (2024) Statistics on waste managed by local authorities in England in 2022/23. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results/local-authority-collected-waste-management-annual-results-202223#:~:text=In%202022%2C%20total%20waste%20from,decrease%20of%207.9%20per%20cent.> [Date accessed: 17/04/25]

²⁹ People per Dwelling has been calculated using the ONS mid-2021 population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>) and dwelling stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

- 3.9.2 Based on these figures, and assuming new residents will generate waste in line with the current average, it has been calculated that proposals for 1,299 homes or more have potential to increase household waste generation by 1% or more in comparison to the current estimates for Sandwell. Proposals for 130 homes or more are expected to increase household waste generation by 0.1% or more in comparison to current estimates for Sandwell. The site proposed the development of 250 dwellings. The proposed development at the site will be expected to increase household waste generation by more than 0.1% in comparison to current levels. Therefore, the proposed development at the site could potentially result in a minor negative impact on household waste generation.

Table 3.8: Site impact matrix for SA Objective 8 – Waste

Site Name	Potential Increase in Household Waste Generation
Rowley Regis Golf Course	-

3.10 SA Objective 9: Transport and Accessibility

Bus Stop

- 3.10.1 In Sandwell there are many bus routes, which will be expected to generally provide good public transport access, with the exception of some small areas to the east of the borough and pockets in the centre where bus stops are more thinly distributed. The site is located within 400m to multiple bus stops, including bus stops along Hanover Road and Portway Road. The proposed development at the site will be expected to have a minor positive impact on access to sustainable transport options.

Railway Station

- 3.10.2 There are several railway stations located within the borough of Sandwell, as well as many metro stations located along the West Midlands Metro line which goes through West Bromwich Central Station. A large proportion of the borough will be expected to have good access to these stations, including the site which is located within 2km of two railway stations, 'Rowley Regis Station' and 'Old Hill Station' both located south of the site.

Pedestrian Access

- 3.10.3 Sites with good pedestrian access can be described as those with existing pavements or pathways which are segregated from traffic use in the area, which are generally well distributed throughout Sandwell, due to its built-up nature. The site is well connected to the existing footpath network, including access via a pavement along Tippet Green Road. Therefore, the proposed development at the site will be likely to have a minor positive impact on local transport and accessibility, by potentially encouraging travel by foot and reducing requirement for new pedestrian access to be created.

Road Access

- 3.10.4 A network of major and minor roads can be found throughout Sandwell, which will be expected to provide good road access in the local area and nationally. The site is located adjacent to Tippet Green Road, and therefore, the proposed development will be expected to provide site end users with good access to the existing road network, resulting in a minor positive impact on transport and accessibility.

Pedestrian Access to Local Services

- 3.10.5 Sites with sustainable pedestrian access to local fresh food and services in Sandwell are considered to be those within a 15-minute walking distance. According to accessibility modelling data provided by the Council, a large proportion of the borough meets these criteria, however, there are some sections in the north-east, south-west and centre of the borough where pedestrian access to services is likely to be more restricted. The site is wholly located outside of a 15-minute walking distance to these services; therefore, the proposed development at this site could potentially have a minor negative impact on the sustainable access of site end users to local services, based on current infrastructure.

Public Transport Access to Local Services

- 3.10.6 Accessibility modelling data indicates that almost the entirety of the borough has good sustainable transport access to local fresh food and services, within 15 minutes travel time via public transport. The majority of the site is located within 10 minutes travel time via public transport to local services and will be expected to have a major positive impact on the access of site end users to local services.

Table 3.9: Site impact matrix for SA Objective 9 – Transport and accessibility

Site Name	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
Rowley Regis Golf Course	+	+	+	+	-	++

3.11 SA Objective 10: Housing

Housing Provision

- 3.11.1 The site is proposed for the development of 250 dwellings, which will make a significant contribution towards meeting housing needs, and as such, result in a major positive impact on housing provision.

Table 3.10: Site impact matrix for SA Objective 10 – Housing

Site Name	Housing Provision
Rowley Regis Golf Course	++

3.12 SA Objective 11: Equality

Index of Multiple Deprivation

- 3.12.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England³⁰. Out of 317 local authorities in England, Sandwell is ranked as the 12th most deprived³¹. The site is located outside of the most deprived 10% LSOAs, and therefore, the proposed development at the site may have a negligible impact on equality.

³⁰ Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 17/04/25]

³¹ Active Black Country (2023) Indices of Multiple Deprivation, 2019. Available at: <https://www.activeblackcountry.co.uk/insight-hub/data/communities/indices-of-multiple-deprivation-2019/> [Date accessed: 17/04/25]

- 3.12.2 It should be noted that there is a degree of uncertainty with regard to the impact on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

Table 3.11: Site impact matrix for SA Objective 11 – Equality

Site Name	IMD 10% Most Deprived
Rowley Regis Golf Course	0

3.13 SA Objective 12: Health

NHS Hospital with Accident & Emergency Department

- 3.13.1 The Midland Metropolitan Hospital is the only NHS Hospital with an Accident & Emergency department within the borough itself, although there are other nearby hospitals such as Manor Hospital in Walsall to the north, which will also provide these services. The majority of the site is located beyond 5km from an NHS Hospital with A&E services, and therefore, the proposed development at the site could potentially have a minor negative impact on access to emergency healthcare.

Pedestrian Access to a GP Surgery

- 3.13.2 There are 73 GP Surgeries distributed within Sandwell, serving the existing local communities, particularly clustered within the south east and north west of the borough. Accessibility modelling data has been provided to Lepus by SMBC, mapping the location of GP surgeries and areas within a sustainable travel time to these facilities for pedestrians. The modelling indicates that the majority of the site is located within a 15-minute walk to a GP surgery, with a small proportion located outside this sustainable travel time. The north section of the site is located within a 15-minute walk to Whiteheath Clinic and southern sections of the site are located within a 15-minute walk to Hawes Lane Surgery. The proposed development will be expected to have a minor positive impact on access to healthcare.

Public Transport Access to GP Surgery

- 3.13.3 Sustainable public transport access to a local GP surgery is identified to be within a 15-minute journey. According to accessibility modelling data, this travel time to healthcare is likely to be achieved across the majority of Sandwell, with the exception of small pockets in the east and west. The site is located within a 10-minute travel time to Hawes Lane Surgery, as such a minor positive impact on sustainable access to healthcare is likely.

Access to Greenspace

- 3.13.4 Greenspaces are distributed throughout the borough, including parks, allotments, playing fields and Sandwell Valley Country Park located in the north east of the borough. The site is wholly located within 600m to multiple greenspaces, including 'Saint Giles Church' and 'Bowling Green'. Therefore, a minor positive impact is identified for the site, as the proposed development will be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

Net loss of Greenspace

- 3.13.5 The site coincides with 'Hanover Road Open Space' according to data provided by the Council and 'Rowley Regis Golf Course' according to OS Open Greenspace data. The proposed development at the site could potentially result in a loss of greenspace, and therefore, have a minor negative impact on the provision of greenspace across the Plan area.

Public Right of Way / Cycle Path

- 3.13.6 The site is located within 600m of the Public Right of Way (PRoW) network. The proposed development at the site will be likely to provide site end users with good pedestrian access and encourage physical activity, and therefore, have a minor positive impact on health and wellbeing of local residents.

Table 3.12: Site impact matrix for SA Objective 12 – Economy

Site Name	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
Rowley Regis Golf Course	-	+	++	+	-	+

3.14 SA Objective 13: Economy

Employment Floorspace Provision

- 3.14.1 Employment floorspace has been assessed with consideration of current land use and the proposed development at the site. The site is proposed solely for residential use and is wholly located on previously undeveloped land. However, as the site currently comprises the Rowley Regis Golf Course, it is unknown whether the proposed development would lead to a loss of local employment associated with the existing use; at this stage of the assessment, it remains uncertain whether there would be a net change in employment floorspace.

Pedestrian Access to Employment Opportunities

- 3.14.2 There are many employment opportunities currently within Sandwell, with 254 key employment locations identified. Most existing employment land is concentrated in the centre of the borough and close to the strategic road network. Accessibility modelling data has been provided to Lepus by SMBC, mapping key employment locations and areas within a sustainable travel time. According to the modelling data, almost the entirety of the borough is within a 30-minute walk to an employment location, including the site which is within a 20-minute walk to the adjacent 'Droicon Land Industrial Estate'. The site could potentially have a major positive impact on pedestrian access to employment.

Public Transport Access to Employment Opportunities

- 3.14.3 Accessibility modelling data indicates that the majority of the borough is located within a sustainable travel time via public transport to employment opportunities, identified as being within a 30-minute journey. The site is wholly located within a 20-minute travel time via public transport to an employment location and will be expected to have a major positive impact on sustainable access to employment opportunities.

Table 3.13: Site impact matrix for SA Objective 13 – Economy

Site Name	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
Rowley Regis Golf Course	+/-	++	++

3.15 SA Objective 14: Education, Skills and Training

Pedestrian Access to Primary School

- 3.15.1 There are 98 primary schools distributed throughout Sandwell. Accessibility modelling data has been provided to Lepus by SMBC, mapping the location of primary schools and areas within a sustainable travel time to these schools. The majority of the site is located beyond a 15-minute walk to a primary school, and therefore, the proposed development at this site could potentially have a minor negative impact on access to primary schools due to the likely increased reliance of less sustainable transport methods.

Pedestrian Access to Secondary School

- 3.15.2 Accessibility modelling data has been provided to Lepus by SMBC, mapping the location of secondary schools and areas within a sustainable travel time to these schools. There are 20 secondary schools within Sandwell which are fairly evenly distributed across the borough, serving communities within the existing built-up areas but providing more limited access for areas which currently contain less dense development, particularly in the Green Belt to the north east. The majority of the site is located within a 20-minute walk to 'Saint Michaels CE Secondary School'. The proposed development at the site will be likely to encourage pedestrian access to secondary schools and is expected to have a major positive impact on sustainable access to education.

Public Transport Access to Secondary School

- 3.15.3 Existing public transport access to secondary schools within Sandwell is widespread, according to accessibility modelling data, and is likely to provide local residents with good access to schools in the local and wider area. The data indicates only localised pockets of the borough where public transport access to secondary schools is more limited. The site is wholly located within a 20-minute public transport journey to a secondary school, and therefore the proposed development will be expected to have a major positive impact on sustainable access to education.

Table 3.14: Site impact matrix for SA Objective 14 – Education, skills and training

Site Name	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
Rowley Regis Golf Course	-	++	++

3.16 Conclusion

- 3.16.1 The process which has been used to appraise reasonable alternative sites throughout the preparation of the SLP is sequenced through two stages. Firstly, sites are assessed in terms of impacts on the baseline without consideration of mitigation. Secondly, the appraisal findings are further assessed in light of any relevant mitigation that is available through emerging SLP policies. For reasonable alternative sites assessed to date, this information is presented in Appendix G of the Regulation 19 SA³².
- 3.16.2 The pre-mitigation assessment provides a baseline assessment of each site and identifies any local constraints. The pre-mitigation assessment does not consider mitigating factors such as Local Plan policy. The purpose of this stage is to identify the impacts that would need to be overcome for development to optimise sustainability performance.
- 3.16.3 The assessment of the proposed site as presented in **sections 3.2–3.15** identified a range of positive and adverse potential impacts on the objectives within the SA Framework. Negative impacts were mainly identified in relation to issues associated with air quality due to the location of the site within Sandwell AQMA; the likely impact of the site on the borough's carbon footprint associated with the construction and occupation of new development; loss of undeveloped land; loss of greenspaces; and potential adverse effects on the Alsopp's Hill SLINC.
- 3.16.4 Positive impacts were identified in relation to the provision of new housing which could contribute towards the identified needs; benefits to health and accessibility as the site is located within sustainable distance to GP surgeries and public greenspace; sustainable access to secondary schools and public transport including railway and bus services; and the site being wholly located within Flood Zone 1 where fluvial flood risk is low.
- 3.16.5 The overall impact matrix for the site pre-mitigation, summarising the 'worst-case' impact per SA Objective, is presented in **Table 3.15** below.

Table 3.15: Summary of pre-mitigation site assessment

SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Cultural Heritage	Landscape	Biodiversity, Flora & Fauna	Climate Change Mitigation	Climate Change Adaptation	Natural Resources	Pollution	Waste	Transport & Accessibility	Housing	Equality	Health & Wellbeing	Economy	Education
0	+/-	-	-	+	-	--	-	-	++	0	-	+/-	-

3.17 Post-mitigation

- 3.17.1 The post-mitigation assessment considers how mitigating factors, including Local Plan policy and other guidance, will help to avoid or reduce the impacts that were identified at the pre-mitigation stage.

³² Lepus Consulting (2024) Sustainability Appraisal of the Sandwell Local Plan 2024-2041: Regulation 19 SA Report Volume 3 of 3: Appendices. September 2024. Available at: <https://www.sandwell.gov.uk/downloads/file/3209/slp-reg-19-sustainability-appraisal-vol-3-appendices-september-2024-> [Date accessed: 17/04/25]

- 3.17.2 The impact matrix for the site post-mitigation is presented in **Table 3.16**. These impacts have been identified following consideration of the likely mitigation effects of the SLP policies in line with the approach taken within Appendix G of the Regulation 19 SA Report published in September 2024³³.

Table 3.16: Summary of post-mitigation site assessment

SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Cultural Heritage	Landscape	Biodiversity, Flora & Fauna	Climate Change Mitigation	Climate Change Adaptation	Natural Resources	Pollution	Waste	Transport & Accessibility	Housing	Equality	Health & Wellbeing	Economy	Education
0	0	-	-	+	-	-	-	++	++	0	++	0	++

3.18 Selection and rejection

- 3.18.1 Appendix H of the Regulation 19 SA Report (2024)³⁴ set out SMBC's reasons for selection or rejection of each reasonable alternative site that had been identified, described and evaluated during the SA process at the time of its preparation.
- 3.18.2 The additional site at Rowley Regis Golf Course was identified as a reasonable alternative during the Regulation 19 consultation, and evaluated in this SA Addendum. Following consideration of the SA findings as presented within this chapter, SMBC have indicated that the site has been chosen as preferred for allocation for the reasons set out in **Box 3.1**.

Box 3.1: SMBC's outline reasons for selecting the reasonable alternative site at Rowley Regis Golf Course

Comment from Council:

The site was promoted for residential development by a national housebuilder to the Regulation 19 Publication Sandwell Local Plan consultation in late 2024. Following mitigation, its selection for allocation would make a positive impact to climate change adaptation, transport and accessibility, housing provision, health and wellbeing, and education. These positive impacts, particularly towards the provision of housing given the shortfall forecast across the borough, balanced against the negative impacts, warrant the allocation of the site for housing development.

³³ Lepus Consulting (2024) Sustainability Appraisal of the Sandwell Local Plan 2024-2041: Regulation 19 SA Report Volume 3 of 3: Appendices. September 2024. Available at: <https://www.sandwell.gov.uk/downloads/file/3209/slp-reg-19-sustainability-appraisal-vol-3-appendices-september-2024-> [Date accessed: 17/04/25]

³⁴ Lepus Consulting (2024) Sustainability Appraisal of the Sandwell Local Plan 2024-2041: Regulation 19 SA Report Volume 3 of 3: Appendices. September 2024. Available at: <https://www.sandwell.gov.uk/downloads/file/3209/slp-reg-19-sustainability-appraisal-vol-3-appendices-september-2024-> [Date accessed: 17/04/25]

4 Main Modification Two – Policy SCC4

4.1 Overview

4.1.1 Policy SCC4 sets out the requirement for the embodied carbon and waste associated with new development to be considered, forming part of SMBC's strategy to supporting low carbon development, regeneration, and tackling climate change. The term 'embodied carbon' refers to the emissions associated with materials and construction processes throughout the whole lifecycle of a building or infrastructure³⁵.

4.1.2 SMBC have proposed to modify the wording of Policy SCC4 to refer to the BS EN 15978 standard, which is a European standard that provides guidelines for assessing the environmental performance of buildings and construction work. The policy requirement to consider material re-use when demolishing buildings and structures is proposed to be amended so that it is proportionate and would not impose unnecessary burdens on small-scale developments.

4.2 Assessment of modified policy

4.2.1 **Box 4.1** presents the proposed modified text to the Submission version of Policy SCC4, with proposed removed text in ~~strike through~~, and proposed new text **underlined and bold**.

Box 4.1: Proposed modification to Policy SCC4

Policy SCC4 – Embodied carbon and waste

1. Embodied carbon reporting
 - a. All large-scale major new residential ~~developments~~ (50 dwellings or more) and non-residential ~~developments~~ (5,000 m² floorspace or more) ~~developments~~ are required to complete a whole-life carbon assessment in accordance with RICS Whole Life Carbon Assessment guidance **with BS EN 15978 standard. The assessment should be based on the most appropriate and up-to-date guidance available that complies with the principles outlined in the BS EN 15978 standard. Guidance such as the RICS Whole Life Carbon Assessment guidance (2nd edition) may be used, among others.**
2. Limiting embodied carbon
 - a. Positive weight will be given to applications that can demonstrate embodied carbon (RICS/BS 15978 modules A1 – A5) that is limited to 600 kgCO₂e/m² GIA.
3. Building end-of-life
 - a. All new buildings should be designed to enable easy material re-use and disassembly, subsequently reducing the need for end-of-life demolition.
4. Demolition audits
 - a. All major development sites that contain existing buildings / structures must carry out a pre-redevelopment and/or pre-demolition audit, following an ~~an~~ well-established industry best practice method (e.g. BRE), **for larger structures or significant demolitions.**
 - b. **For smaller-scale demolitions, such as individual walls or small outbuildings, developers are required to consider material re-use where feasible, without the need for a full audit. A simplified, proportionate approach should be taken to assess potential material recovery and reuse.**
5. Narrative on embodied carbon in minor development
 - a. Proposals for new development of one or more homes or ≥100m² non-domestic floor space, but below the size thresholds for embodied carbon reporting and targets as noted above, should include a general narrative on the options considered (and where possible, the decisions made) to minimise the embodied carbon of the proposed development.

³⁵ UKGBC (2024) Embodied carbon. Available at: <https://ukgbc.org/our-work/topics/advancing-net-zero/embodied-carbon/#:~:text=Embodied%20carbon%20refers%20to%20the,of%20a%20building%20or%20infrastructure.> [Date accessed: 17/04/25]

- 4.2.2 The proposed modification retains the requirement for new major developments to complete a whole-life carbon assessment, but clarifies that use of RICS guidance³⁶ is not specifically required, and instead ensures compliance with the principles of the BS EN 15978 standard³⁷. Additionally, the modification clarifies the proportionate approach that will be permitted for smaller-scale demolitions where a full audit is not necessary.
- 4.2.3 The proposed changes to Policy SCC4 will still be expected to ensure that opportunities to identify and reduce carbon emissions are explored, and a circular economy is supported. The SA assessment of the policy remains unchanged from the Regulation 19 SA as replicated in **Table 4.1** below.
- 4.2.4 The full assessment narrative and explanation behind each score can be found in Appendix F of the Regulation 19 SA Report (2024)³⁸.

Table 4.1: Policy matrix for proposed modification to Policy SCC4

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SCC4	0	0	0	++	0	0	+	++	0	0	0	0	+	0

³⁶ RICS WLCA Guidance. Available at: <https://www.rics.org/profession-standards/rics-standards-and-guidance/sector-standards/construction-standards/whole-life-carbon-assessment> [Date accessed: 17/04/25]

³⁷ BSI Knowledge (2011) BS EN 15978. Available at: <https://knowledge.bsigroup.com/products/sustainability-of-construction-works-assessment-of-environmental-performance-of-buildings-calculation-method> [Date accessed: 17/04/25]

³⁸ Lepus Consulting (2024) Sustainability Appraisal of the Sandwell Local Plan 2024-2041: Regulation 19 SA Report Volume 3 of 3: Appendices. September 2024. Available at: <https://www.sandwell.gov.uk/downloads/file/3209/slp-reg-19-sustainability-appraisal-vol-3-appendices-september-2024-> [Date accessed: 17/04/25]

5 Main Modification Three – Policy SNE2

5.1 Overview

- 5.1.1 Policy SNE2 (Protection and Enhancement of Wildlife Habitats) identifies six sites (known as habitat banks) as suitable for the provision of Biodiversity Net Gain (BNG) biodiversity units to developers who cannot secure the legally required 10% BNG on-site.
- 5.1.2 SMBC have proposed to remove Hill House Farm as a potential habitat bank for BNG, and instead substitute with Ray Hall Pastoral Land.

5.2 Assessment of modified policy

- 5.2.1 **Box 5.1** presents the proposed modified text to the Submission version of Policy SNE2, with proposed removed text in ~~strike through~~, and proposed new text **underlined and bold**.

Box 5.1: Proposed modification to Policy SNE2

Policy SNE2 – Protection and enhancement of wildlife habitats

Biodiversity Net Gain

1. All development proposals in Sandwell shall deliver a minimum 10% net gain in biodiversity value when measured against baseline site information. Where achievable, a higher net gain may be agreed. Losses and gains will be calculated using the extant national Biodiversity Metric³⁹.
2. Biodiversity net gain must be provided in line with the following principles:
 - b. there will be a requirement for on-site habitat provision / enhancement wherever practicable, followed by improvements to sites within the local area, and then other sites elsewhere within Sandwell;
 - c. where off-site measures are needed to meet biodiversity net gain requirements, it is expected that the off-site habitat enhancement or creation will be located as close to the development site as possible;
 - d. the maintenance and enhancement of the ability of plants and animals (including pollinating insects) to move, migrate and genetically disperse across Sandwell and the wider Black Country must be supported; and
 - e. the provision / enhancement of priority habitats identified at the national, regional, or local level, will be supported, particularly where those habitats are currently scarce in Sandwell.
3. Compensation in the form of national biodiversity credits will only be accepted as a fall-back if mitigation is not possible within the development site boundary, elsewhere in its immediate vicinity or in the wider Sandwell area.
4. Provision of on- or off-site compensation should not adversely impact on existing alternative / valuable habitats in those locations, nor on areas identified as heritage assets or that are considered highly likely to contain unrevealed archaeological assets. Compensatory works on them should be established via a legal agreement or be under way prior to the related development being undertaken.
5. Monitoring of BNG compensation measures will be required to ensure its successful delivery, with further compensation being required in the event of initial measures being ineffective. Ongoing management of

³⁹ BNG is measured using the current (or any subsequent updated) version of the Biodiversity Metric Calculation Tool. Natural England has published detailed guidance on how to use the metric.

Policy SNE2 – Protection and enhancement of wildlife habitats

any new or improved BNG habitats together with monitoring and reporting will need to be planned for and funded for 30 years by developers, using a Conservation Covenant or s106 agreement as necessary.

6. Sandwell Council has identified the following site(s) as suitable for the provision of biodiversity units to developers unable to provide a minimum 10% net gain on their own sites (see Appendix A and evidence base):

Location	Potential project types	Baseline units	Potential uplift units (%)
Hill House Farm Ray Hall Pastoral Land	Large areas of 'modified grassland' within the site that could be improved to 'other neutral grassland' of good condition. The current land use may have to be adapted to accommodate these changes (arable). There is potential for uplift in other habitats on site. Comprises an area of natural and semi-natural greenspace containing several fields of pastures divided by hedgerows with trees. Ray Hall Pastoral Land contains pockets of poor and moderate 'other neutral grassland' which is divided by woodland and scrub. The grassland and woodland habitats offer the most potential for uplift. NB – Ray Hall pastoral land and Hill Farm Bridge Fields will be delivered together as a single unit.	241.73 87.75	+255.87 (105.85) +48.05 (54.76)
Hill Farm Bridge Fields	Vary sward height and increase species diversity to improve the condition of the grasslands. Condition of the woodland can be improved through introduction of deadwood and management of habitat regeneration.	181.24	+65.90 (36.36)
Menzies Open Space	Woodland improvement, some grassland improvement Areas of 'other neutral grassland' can provide uplift. Site contains a pond (non-priority). There is potential to create more uplift by improving the condition of the pond from poor to good.	157.4	+42.28 (26.86)
Wolverhampton Tibbington Open Space (The Cracker)	Some grassland management / improvement, woodland improvement Relatively large areas of woodland offer strong uplift potential. 'Other neutral grassland' habitats and the parkland habitat both provide uplift opportunities.	90.57	+32.91 (36.17)
Warrens Hall Local Nature Reserve and Strategic Open Space	Woodland improvement, some grassland improvement	211.70	+26.93 (12.72)
Tividale Park	Scrub species and structural improvement, tree and woodland improvement	49.65	+10.39 (20.92)

NOTE: Developers are not required to buy units on Council-owned sites; other public or private landowners may also provide them elsewhere in Sandwell.

Local Nature Recovery Strategy

7. All development should help deliver the Local Nature Recovery Strategy in line with the following principles:

Policy SNE2 – Protection and enhancement of wildlife habitats

- a. take account of where in the Local Nature Recovery Network the development is located and deliver benefits appropriate to that zone, in accordance with section 2d above;
 - b. follow the mitigation hierarchy of avoidance, mitigation and compensation, and provide for the protection, enhancement, restoration and creation of wildlife habitat and green infrastructure;
 - c. follow the principles of Making Space for Nature - recognise that spaces are needed for nature and that these should be of sufficient size and quality and must be appropriately connected to other areas of green infrastructure, to address the objectives of the local Nature Recovery Network Strategy.
8. Priority locations for habitat creation and enhancement are as shown on the Sandwell Local Nature Recovery Strategy map (Appendix A). Development sites within the identified zones will be expected to contribute towards the creation of appropriate habitat linkages and types to support those priority areas.
9. Development should be designed to protect and enhance existing habitats and ecological networks, including wildlife corridors and stepping stones. Development should minimise any potential disturbance to species and habitats, including from site lighting.

Local opportunities for habitats and wildlife

10. All development shall secure the eradication of invasive species within site boundaries, where opportunities to do so arise.
11. All major development proposals with an eaves height or roof commencement height of 5m and above are required to provide integrated swift nesting bricks for various species of small birds, and / or bat boxes as appropriate, to help preserve endangered fauna and support urban biodiversity in Sandwell.
12. All applicants, including those undertaking householder schemes and smaller-scale developments are asked to consider including additional enhancement opportunities for wildlife and conservation in their proposals; the Council will consider such contributions positively when determining planning applications.

- 5.2.2 Policy SNE2 aligns with statutory requirements and requires development to deliver a minimum 10% BNG. Where uplift is not possible on-site, SMBC has identified habitat bank sites as suitable for the provision of off-site biodiversity units. This will help to secure BNG in line with the mitigation hierarchy and also ensure that off-site BNG aligns with SMBC's priorities and will benefit the residents of Sandwell.
- 5.2.3 The proposed modification replaces a proposed habitat bank within Sandwell but does not change any policy wording or the intention of the policy. The SA assessment of the policy remains unchanged from the Regulation 19 SA as replicated in **Table 5.1** below.
- 5.2.4 The full assessment narrative and explanation behind each score can be found in Appendix F of the Regulation 19 SA Report (2024)⁴⁰.

⁴⁰ Lepus Consulting (2024) Sustainability Appraisal of the Sandwell Local Plan 2024-2041: Regulation 19 SA Report Volume 3 of 3: Appendices. September 2024. Available at: <https://www.sandwell.gov.uk/downloads/file/3209/slp-reg-19-sustainability-appraisal-vol-3-appendices-september-2024-> [Date accessed: 17/04/25]

Table 5.1: Policy matrix for proposed modification to Policy SNE2

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SNE2	0	+	++	+	+	0	+	0	0	0	0	+	0	0

6 Conclusion

6.1 Conclusion

6.1.1 The proposed main modifications to the SLP as proposed by SMBC have been evaluated in **Chapters 3–5** of this report to determine whether the proposed modifications are likely to lead to changes in the sustainability performance of the related part of the plan.

6.1.2 SMBC has proposed three potential main modifications to the SLP:

- The proposed allocation of part of Rowley Regis Golf Course, Tippity Green, for housing development.
- Changes to the wording of Policy SCC4 – Embodied Carbon and Waste.
- The removal of Hill House Farm as a potential Habitat Bank for BNG and the inclusion of Hill Farm Bridge Fields and Ray Hall Pastoral Land (Policy SNE2 – Protection and Enhancement of Wildlife Habitats).

6.1.3 Minor changes have been made to the wording and content of SLP Policies SCC4 and SNE2 compared to the versions that were assessed in the Regulation 19 SA. The appraisal has identified that these modified policies are unlikely to result in any significant effects and the evaluation of both policies against the SA Framework remains unchanged since the Regulation 19 SA.

6.1.4 The additional site at Rowley Regis Golf Course has been evaluated using the same methodology as other reasonable alternative sites, pre- and post-mitigation. Following consideration of SLP policy mitigation, mixed effects have been identified however none will change the residual effects of the SLP as a whole as identified in the Regulation 19 SA Report (2024).

6.2 Next steps

6.2.1 This SA Addendum will be subject to consultation alongside the SLP Proposed Main Modifications Consultation Document between 28th April and 9th June 2025.

6.2.2 The purpose of this consultation is to invite representations on the proposed main modifications under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

6.2.3 All representations received will be considered by the Inspector who has been appointed by the Secretary of State to carry out the independent examination of the SLP. The decision on whether to incorporate the proposed main modifications is taken by the Inspector, and this consultation is taking place without prejudice to the Inspector's final conclusions.

6.2.4 Further information regarding the examination process can be found on the SLP website: <https://www.sandwell.gov.uk/localplanexamination>

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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