

# **Sustainability Appraisal of the Sandwell Local Plan 2024–2041**

## **Response to Inspector's Questions raised during Week 1 Hearings (Addendum to the Regulation 19 SA Report)**

August 2025



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



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LC-1393	Document Control Box
Client	Sandwell Metropolitan Borough Council
Report title	Response to Inspector's Questions raised during Week 1 Hearings (Addendum to Regulation 19 SA Report)
Status	Final
File name	<u>LC-1393_Sandwell_SA_EiP_Note_7_280825LB.docx</u>
Date	August 2025
Author	LB
Reviewed	ND
Approved	ND

Front Cover: Sandwell Valley Country Park – Ryan Gardner Photography

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# 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 on 11<sup>th</sup> December 2024<sup>1</sup>, the SLP is undergoing independent examination. The Week 1 Examination in Public (EiP) Hearings were held between 15<sup>th</sup> and 18<sup>th</sup> July 2025 and included consideration of Matter 1: Procedural and Legal Requirements, Issue 1c 'Whether the plan has been prepared in compliance with other legal and procedural requirements', with Question 1.10<sup>2</sup> asking:

1.1.3 *"Does the SA provide a comprehensive and robust basis to inform the strategy and contents of the plan, particularly in terms of:*

- a. Whether the methodology is appropriate?*
- b. Its assessment of the likely effects of the plan's policies and site allocations?*
- c. Its consideration of reasonable alternatives, including alternative spatial strategy options, and why they were rejected / discounted?"*

1.1.4 This SA document has been prepared at the request of the Inspector during the Week 1 EiP Hearings, to provide:

- An evaluation of the 'Hybrid Balanced Green Growth' spatial growth option that forms SMBC's chosen spatial strategy approach as set out in the Regulation 19 Publication Version of the SLP<sup>3</sup> in line with the previously assessed options in the SA process; and
- Consideration of implications of the latest flood risk information on site allocations within the SLP, derived from the Level 2 Strategic Flood Risk Assessment (SFRA) that was published after the Regulation 19 SA.

1.1.5 This SA document forms an Addendum to the Regulation 19 SA Report published in September 2024<sup>4</sup>. The Regulation 19 SLP and evidence, including the SA, were subject to consultation between 23<sup>rd</sup> September and 11<sup>th</sup> November 2024.

<sup>1</sup> SMBC (2024) Publication Sandwell Local Plan. Available at: <https://www.sandwell.gov.uk/planning/sandwell-local-plan> [Date accessed: 01/08/25]

<sup>2</sup> Planning Inspectorate (2025) Sandwell Local Plan 2024-2041 – Examination. Matters, Issues and Questions (MIQs) for Hearing Week 1. Available at: <https://www.sandwell.gov.uk/downloads/file/4048/sa-ed33-miqs-week-1> [Date accessed: 06/08/25]

<sup>3</sup> SMBC (2025) Sandwell Local Plan – Proposed Main Modifications Consultation Document (Regulation 19)

<sup>4</sup> 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: 01/08/25]

## 1.2 The SA process to date

1.2.1 This SA document 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:

- The **SA Scoping Report** (January 2023)<sup>5</sup> 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)<sup>6</sup> 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)<sup>7</sup> 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)<sup>8</sup> 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.
- The **Regulation 19 SA Addendum** (April 2024)<sup>9</sup> included an evaluation of three potential main modifications that SMBC identified following submission of the SLP including one proposed additional site allocation, and changes to the wording of two SLP policies.

<sup>5</sup> 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: 01/08/25]

<sup>6</sup> 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: 01/08/25]

<sup>7</sup> 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: 01/08/25]

<sup>8</sup> 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: 01/08/25]

<sup>9</sup> Lepus Consulting (2025) Sustainability Appraisal of the Sandwell Local Plan 2024-2041: Addendum to the Regulation 19 SA to support the Examination of the SLP. April 2025. Available at: <https://www.sandwell.gov.uk/downloads/file/4259/sa-ed51-sandwell-sa-addendum-22-04-25> [Date accessed: 01/08/25]

## 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 Directive<sup>10</sup>). The Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations, SI no. 1633<sup>11</sup>). 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. 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.
- 1.3.2 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.
- 1.3.3 Planning Practice Guidance (PPG) on SEA and SA<sup>12</sup> 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 of the SLP and the Regulation 19 SA (2024). 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 hybrid ‘Balanced Green Growth’ option;
  - **Chapter 4** includes an overview of the latest flood risk information and considers the implications for sites assessed during the SA process; and
  - **Chapter 6** provides an overview of the conclusions of the SA Addendum and outlines the next steps for the SLP.

<sup>10</sup> 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: 01/08/25]

<sup>11</sup> The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date accessed: 01/08/25]

<sup>12</sup> MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 01/08/25]

## 2 Assessment 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 Report<sup>13</sup>) 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 consists of SA Objectives and decision-making criteria. Acting as benchmarks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations<sup>14</sup>.
- 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.

<sup>13</sup> 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]

<sup>14</sup> 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	<b>Cultural heritage:</b> Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	Cultural heritage
2	<b>Landscape:</b> 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	<b>Biodiversity, flora, fauna and geodiversity:</b> Protect, enhance and manage biodiversity and geodiversity.	Biodiversity, flora and fauna
4	<b>Climate change mitigation:</b> Minimise Sandwell's contribution to climate change.	Climatic factors
5	<b>Climate change adaptation:</b> Plan for the anticipated levels of climate change.	Climatic factors, soil and water
6	<b>Natural resources:</b> Protect and conserve natural resources.	Soil, water and material assets
7	<b>Pollution:</b> Reduce air, soil, water and noise pollution.	Air, water, soil and human health
8	<b>Waste:</b> Reduce waste generation and disposal and achieve the sustainable management of waste.	Population and material assets
9	<b>Transport and accessibility:</b> 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	<b>Housing:</b> Provide affordable, environmentally sound and good quality housing for all.	Population
11	<b>Equality:</b> Reduce poverty, crime and social deprivation and secure economic inclusion.	Population and human health
12	<b>Health:</b> Safeguard and improve community health, safety and wellbeing.	Human health and population
13	<b>Economy:</b> Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	Population and material assets
14	<b>Education, skills and training:</b> 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 Regulations<sup>15</sup> 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 2.1**).

### Box 2.1: Schedule 1 of the SEA Regulations<sup>16</sup>

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.

<sup>15</sup> 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]

<sup>16</sup> 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 Regulations<sup>17</sup>, 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)
<b>Major Negative</b> --	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> <li>• Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance;</li> <li>• Cause a very high-quality receptor to be permanently diminished;</li> <li>• Be unable to be entirely mitigated;</li> <li>• Be discordant with the existing setting; and/or</li> <li>• Contribute to a cumulative significant effect.</li> </ul>
<b>Minor Negative</b> -	<ul style="list-style-type: none"> <li>• The size, nature and location of development proposals would be likely to:</li> <li>• Not quite fit into the existing location or with existing receptor qualities; and/or</li> <li>• Affect undesignated yet recognised local receptors.</li> </ul>
<b>Negligible</b> 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
<b>Uncertain</b> +/-	It is uncertain whether impacts would be positive or adverse.
<b>Minor Positive</b> +	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> <li>• Improve undesignated yet recognised receptor qualities at the local scale;</li> <li>• Fit into, or with, the existing location and existing receptor qualities; and/or</li> <li>• Enable the restoration of valued characteristic features.</li> </ul>
<b>Major Positive</b> ++	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> <li>• Enhance and redefine the location in a positive manner, making a contribution at a national or international scale;</li> <li>• Restore valued receptors which were degraded through previous uses; and/or</li> <li>• Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.</li> </ul>

<sup>17</sup> 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]

- 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 principle<sup>18</sup> 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 Report<sup>19</sup>.
- 2.5 Limitations of predicting effects**
- 2.5.1 SA/SEA is a tool for identifying potential significant effects. While it draws on an evidence-based approach and expert judgement, it is not always possible to predict outcomes with certainty. Many impacts depend on factors such as scheme design and the effectiveness of mitigation measures.
- 2.5.2 The assessments in this report are based on the best available information, including secondary data provided to Lepus by the Council and other publicly available sources. Every effort has been made to predict effects as accurately as possible.

<sup>18</sup> 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”.

<sup>19</sup> 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, using available secondary data relevant to each SA Objective. All reasonable alternatives and the preferred options are assessed consistently using the same method. Where detailed information is unavailable, reasonable assumptions are made based on the best available data and trends. Where site-specific data is introduced, this is clearly identified, as the use of such data could otherwise risk biasing or skewing the assessment.
- 2.5.4 The assessment of development proposals is constrained by the availability of detailed data. For example, up-to-date ecological surveys or landscape and visual impact assessments were not available. Similarly, the appraisal of the SLP is limited in its assessment of carbon emissions; more detailed carbon data would enable effects to be quantified more accurately.

## 3 Assessment of spatial growth options

### 3.1 Overview of reasonable alternatives

3.1.1 As summarised in Chapter 5 of the Regulation 19 SA<sup>20</sup>, a range of reasonable alternatives have been identified, described and evaluated during the iterative SA process alongside SMBC's preparation of the SLP. This includes:

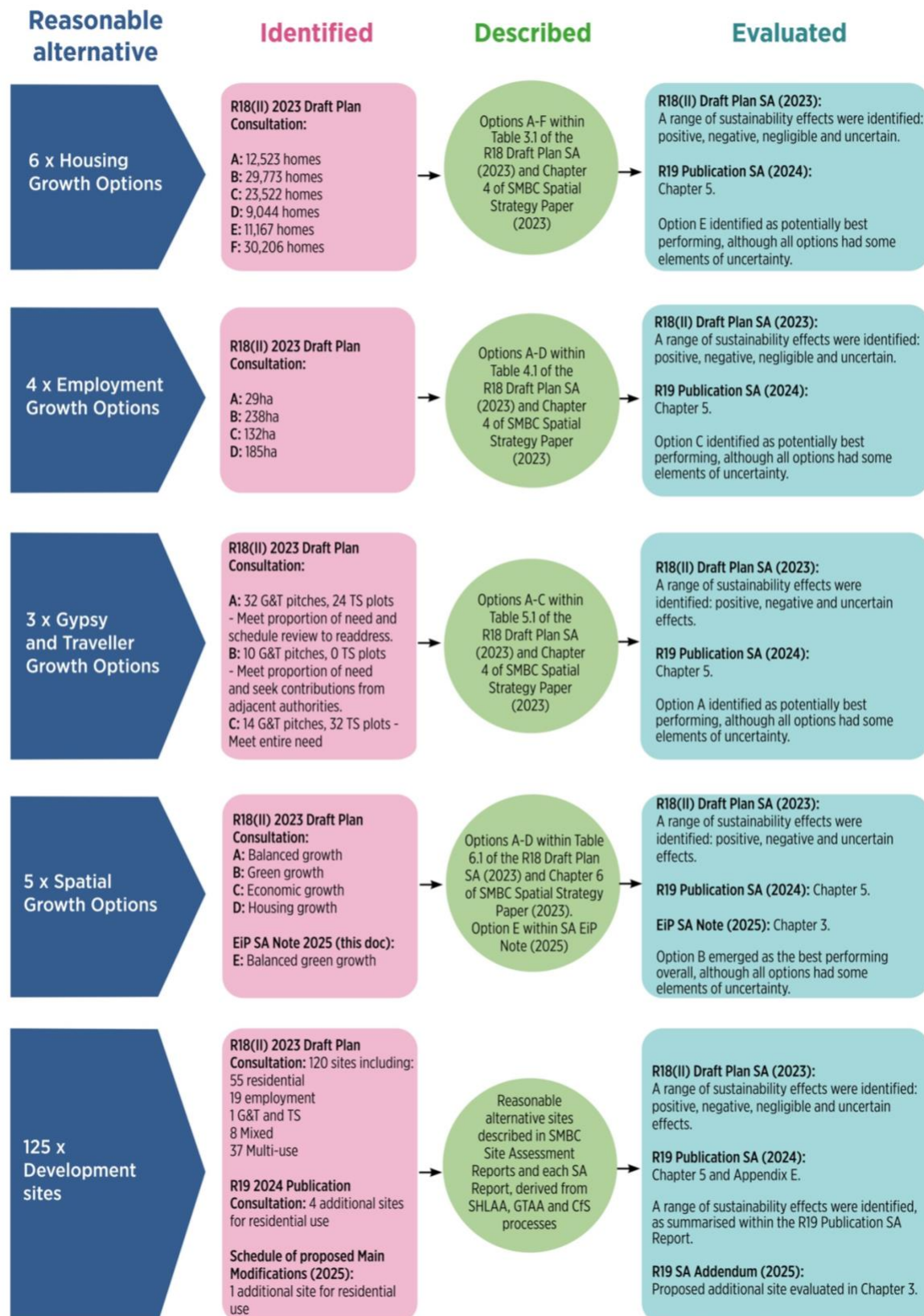
- **Housing Growth Options x6** (Regulation 18(II) SA, 2023);
- **Employment Growth Options x4** (Regulation 18(II) SA, 2023);
- **Gypsy and Traveller Growth Options x3** (Regulation 18(II) SA, 2023);
- **Spatial Growth Options x4** (Regulation 18(II) SA, 2023); and,
- **Development Sites x125** (120 within the Regulation 18(II) SA, 2023; four within the Regulation 19 SA, 2024; and one within the Regulation 19 SA Addendum (2024) as part of SMBC's Proposed Main Modifications.

3.1.2 **Figure 3.1** summarises the reasonable alternatives considered throughout the plan-making process, and at which chronological stage of the SA process these alternatives have been identified, described and evaluated. This is an update to the version presented in the Regulation 19 SA (Figure 5.1).

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<sup>20</sup> 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: 01/08/25]

# Quick guide to reasonable alternatives



**Figure 3.1:** The identification, description and evaluation of reasonable alternatives considered throughout the plan making process

## 3.2 Spatial growth options

- 3.2.1 As part of the reasonable alternatives exercise, four spatial growth options were assessed within the Draft Plan SA Report<sup>21</sup> (Regulation 18(II), 2018), as summarised in section 5.6 of the Regulation 19 SA, and presented in **Table 3.1** below.
- 3.2.2 These options consider how the overall number of homes and area of employment land (and other types of land use where applicable) could be strategically distributed, thus helping to meet some of the strategic aims of the emerging SLP.
- 3.2.3 Given Sandwell's highly urbanised nature with very little vacant or unused open spaces, and the importance of the existing open and green spaces for environmental and human health, the Council considers that it is limited in the number of approaches it can take to accommodate growth.

**Table 3.1: Spatial growth options identified and described by SMBC (see the R18 (II) Draft SA Report, 2023)**

Option	Description provided by SMBC
<b>A – Balanced Growth</b>	<ul style="list-style-type: none"> <li>Focus most new growth within the existing residential and employment areas of Sandwell;</li> <li>Continue to deliver most new development on previously developed land and sites;</li> <li>Take advantage of existing and improved infrastructure capacity to maximise development on new sites</li> <li>Make improvements to/allowances for the environmental, climate change, accessibility and socio-economic capacity of existing residential and employment areas;</li> <li>Examine the potential for providing housing/employment development on areas of vacant and underused open spaces and undeveloped land within the urban areas;</li> <li>Protect areas of designated habitat and ecological value; and,</li> <li>Protect the historic and archaeological environment and areas with geological and landscape value.</li> </ul>
<b>B – Green Growth</b>	<ul style="list-style-type: none"> <li>Restrict new development to brownfield and previously developed sites;</li> <li>Promote the use of zero- and low-carbon designs, building techniques, materials and technologies in all new development;</li> <li>Only allocate housing in locations with the highest levels of sustainable transport access to residential services (retail provision, schools, healthcare facilities, fresh food, employment, etc.);</li> <li>Only allocate new employment land where sustainable access and good public transport links are available;</li> <li>Redevelop existing housing and employment areas to deliver cleaner, more energy-efficient and more intensive areas of growth;</li> <li>Maximise climate change adaptation and mitigation through the creation, protection and improvement of parks, woodland and tree planting, open spaces, landscapes and habitats across the borough;</li> <li>Protect open spaces and areas of habitat and ecological value within and beyond the urban areas;</li> <li>Create additional public open spaces to serve new housing developments; and,</li> <li>Protect the historic and archaeological environment and areas with geological and landscape value.</li> </ul>

<sup>21</sup> 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: 01/08/25]

Option	Description provided by SMBC
<b>C – Economic Growth</b>	<ul style="list-style-type: none"> <li>Retain, protect and enhance all types of local employment land;</li> <li>Intensify the use of existing employment areas through redevelopment and redesign of existing areas and infrastructure improvements;</li> <li>Explore the redevelopment of retail and other commercial areas in town centres to provide additional employment sites;</li> <li>Allocate employment sites on derelict/vacant open space within the urban area;</li> <li>Identify and allocate areas with the potential to deliver larger employment sites via site assembly;</li> <li>Locate new housing and services, facilities and infrastructure to serve existing and proposed employment areas;</li> <li>Protect areas of designated habitat and ecological value; and,</li> <li>Protect the historic environment, including areas with industrial design and archaeological interest, and areas with geological and landscape value.</li> </ul>
<b>D – Housing Growth</b>	<ul style="list-style-type: none"> <li>Focus new growth within the existing residential and employment areas of Sandwell;</li> <li>Continue to deliver most new development on previously developed land and sites;</li> <li>Examine the potential for providing housing development on areas of vacant and underused open spaces and undeveloped land within the urban areas;</li> <li>Redevelop areas of existing older housing to provide higher density and energy-efficient new housing;</li> <li>Reallocate areas identified for employment land provision for additional housing development;</li> <li>Allocate new housing on urban sites around transport hubs/nodes and in towns and local centres, including the use of tall buildings in appropriate locations;</li> <li>Increase overall housing densities to 100 dph in centres and 45 dph outside centres and meet capacity gaps in associated residential services e.g. schools, healthcare, leisure/recreation, infrastructure;</li> <li>Protect areas of designated habitat and ecological value; and,</li> <li>Protect the historic and archaeological environment and areas with geological and landscape value.</li> </ul>

3.2.4 Each option was assessed using the SA Framework and summary findings are presented in **Table 3.2**. The assessments are presented in full in the Regulation 18 (II) SA Draft Plan<sup>22</sup>.

**Table 3.2: SA performance of the spatial growth options (see the R18 (II) Draft Plan SA Report, 2023)**

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Spatial Growth Option	Cultural heritage	Landscape	Biodiversity, flora, fauna and	Climate change mitigation	Climate change adaptation	Natural resources	Pollution	Waste	Transport and accessibility	Housing	Equality	Health	Economy	Education, skills and training
A	-	-	+	+	+	-	-	+	+	+	+	-	+	+/-
B	-	+	++	++	++	+	+	+/-	++	+	+/-	+	+	+
C	-	-	+/-	+/-	+/-	-	-	-	+	+	+/-	-	++	+/-
D	-	-	+/-	+	+	-	-	-	+	+	+/-	-	-	++

<sup>22</sup> 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: 01/08/25]

- 3.2.5 Taking into account the limitations of the high-level assessment, overall, Option B was identified as the best performing of the four options. It was found to reduce the impacts on the environment relative to the other options, whilst providing residential and employment growth. However, it was not clear exactly what level of growth this option would support, as the quantities of housing or employment development that could be attained under this option were not known. As such, the Regulation 18 SA recommended that a refinement of this option might provide the best option overall.
- 3.2.6 Taking the assessment findings into consideration, in their selection/rejection of options, SMBC considered the following (as set out in **Box 3.1**), replicated from section 5.6 of the Regulation 19 SA.

**Box 3.1: SMBC selection/rejection commentary on spatial growth options (extracted from R19 SA, 2024)**

No single option would have no adverse environmental or sustainability impact; however, it is clear from the summary assessment that two options (Housing-led and Employment-led) would not support the balanced and sustainable mix of development and environmental and social benefits required to deliver transformational change in Sandwell. It is apparent that the most appropriate and deliverable strategy for housing, employment and environmental protection and improvement in Sandwell, which will also confirm our ambitions to improve the health and wellbeing of residents, would be a combination of options A and B. This will deliver what we are referring to as the Balanced Green Growth option for the delivery of development in Sandwell. It will allow us to provide a significant quantum of housing and additional employment opportunities in the borough while at the same time promoting a bold strategy supporting the delivery of climate change adaptation and mitigation, environmental protection and enhancement, the conservation and enhancement of the historic environment and the delivery of infrastructure. This in turn will support the Council's wider aims and objectives in improving the health (physical and mental), wellbeing and life chances of people in Sandwell.

- 3.2.7 The 'Balanced Green Growth' spatial strategy was selected by SMBC, drawing on the spatial growth options assessed in the SA process and presented in Policy SDS1 – 'Spatial Strategy for Sandwell'. Policy SDS1 was evaluated in Appendix F of the Regulation 19 SA.
- 3.2.8 Policy SDS1 set out the overall quantum of new homes and employment land, as well as a number of accompanying requirements to ensure that sufficient supporting infrastructure was provided, and that growth will conserve and enhance the natural, built and historic environment of Sandwell.
- 3.3 Evaluation of additional spatial growth option**
- 3.3.1 The Inspector examining the SLP has requested that this selected 'Balanced Green Growth' strategy be evaluated like-for-like with the four spatial growth options previously assessed in the SA process.
- 3.3.2 SMBC has, therefore, provided a high-level description of this additional option ('Option E') so that it can be compared with the options presented in **Table 3.1**. This high-level description of Option E is set out in **Table 3.3** below.

**Table 3.3: Additional spatial growth option identified and described by SMBC**

Option	Description provided by SMBC
<b>E – Balanced Green Growth</b>	<ul style="list-style-type: none"> <li>• Focus new growth within the existing residential and employment areas of Sandwell;</li> <li>• Deliver most new development on previously developed land and sites with the exception of a small number of greenfield sites where they provide opportunities for strategic levels of development;</li> <li>• Redevelop existing housing and employment areas to deliver cleaner, more energy-efficient and more intensive areas of growth<sup>23</sup>;</li> <li>• Allocate housing in locations with the highest levels of sustainable transport access to residential services - retail provision, schools, healthcare facilities, fresh food, employment etc.;</li> <li>• Consider any possibility for increasing housing densities in town centres and West Bromwich;</li> <li>• Take advantage of existing and improved infrastructure capacity to maximise development on new sites;</li> <li>• Maximise climate change adaptation and mitigation through the creation, protection and improvement of parks, woodland and tree planting, open spaces, landscapes and habitats across the borough;</li> <li>• Protect the historic and archaeological environment and areas with geological and landscape value;</li> <li>• Protect open spaces and areas of habitat and ecological value within and beyond the urban areas; and,</li> <li>• Create additional public open spaces to serve new housing developments<sup>24</sup>.</li> </ul>

**SA Objective 1 – Cultural Heritage**

- 3.3.3 All five spatial growth options state they will “*protect the historic and archaeological environment and areas with geological and landscape value*” which could help to conserve the historic landscape character and heritage assets of the borough. The options all aim to focus the majority of new development within the existing urban area; however, as most of Sandwell’s listed buildings and heritage assets are also within the urban area, without careful consideration of development layout, scale and design this could lead to alteration of their historic settings.
- 3.3.4 In particular, Option D promotes higher density development (100dph in centres, and 45dph outside centres) which could increase the potential for adverse effects on the historic environment. Although, the intention to “*redevelop areas of existing older housing*” under Option D could potentially improve the energy efficiency of historic buildings and promote their re-use, helping to conserve their historic identity. Option E includes exploring potential for increased housing densities only in centres and redevelopment of existing housing areas, possibly resulting in lesser adverse effects than Option D. Options B, C and E also include reference to redevelopment, which could provide opportunities to enhance the historic character of these areas.
- 3.3.5 Option C includes a focus on economic growth and seeks to ensure development has regard to areas with industrial design and archaeological interest, which could potentially help to strengthen the sense of place and local identity.

<sup>23</sup> Assuming opportunities arise to do so<sup>24</sup> Where possible e.g. as part of landscaping provision for larger developments

- 3.3.6 There is potential for all the options to have an impact on the setting of heritage assets as they all propose development within the urban area to a greater or lesser extent, as such the all the options could have a minor negative impact with Option D having the potential for the largest impact given the higher density development proposed. Option C could be identified as best performing as it proposes to redevelop town centre areas including vacant and derelict sites.

### **SA Objective 2 – Landscape**

- 3.3.7 The landscape character of the borough is described as low or low-moderate sensitivity to development with one area of moderate-high sensitivity, open landscapes within the borough are important for maintaining separation between settlements and as such their sensitivity may be increased<sup>25</sup>. Green Belt land is located to the north-east of the borough, over 50% of which is described as having very high ecological value<sup>26</sup>. All the spatial growth options aim to keep new development within the existing urban area, redeveloping land or sites, utilising vacant land or under used open spaces, which would prevent Green Belt being lost. Furthermore, all options seek to protect areas with landscape value.
- 3.3.8 Option A would promote growth in existing residential and employment areas, encouraging new developments on previously developed land and examines the potential of utilising vacant or underused land or sites within the urban areas. Option B restricts new development to brownfield or previously developed sites and aims to protect open spaces and areas of ecological value and create additional public open spaces. Option C would redevelop and redesign existing areas and provide infrastructure improvements to intensify the use of existing employment areas. It would also allocate employment sites on derelict or vacant open space within the urban area.
- 3.3.9 Option D would focus growth within existing residential and employment areas of Sandwell utilising previously developed sites and examine the potential for housing development on vacant or underused open spaces or undeveloped land within the urban areas. However, the focus on increasing density including use of taller buildings under Option D could also lead to greater challenges in terms of development potentially altering views of, or from, sensitive and important landscape features. Option E would focus the majority of growth in existing residential and employment areas but also includes potential for higher density development in centres, and strategic development in greenfield locations, meaning there could be a greater likelihood of alteration to the local landscape character in these areas. Options B, C, D and E do, however, also propose redevelopment of existing housing or employment areas which could help to improve the townscape or revitalise degraded areas.

<sup>25</sup> 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](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date accessed: 01/08/25]

<sup>26</sup> EcoRecord (2019) An Ecological evaluation of the Black Country Green Belt. Available at:  
<https://blackcountryplan.dudley.gov.uk/media/13896/an-ecological-evaluation-of-the-black-country-green-belt-final-report-2019-redacted.pdf> [Date accessed: 01/08/25]

- 3.3.10 Whilst all the options aim to promote development within the existing urban area, Options A, C and D propose using underused open space within the urban area which may lead to a minor negative impact on the local landscape character. Option B restricts new development to brownfield sites and aims to protect open spaces and create new public open spaces. Option E similarly seeks to protect existing open spaces, habitats and areas of landscape value, and create new public open spaces to serve new housing developments, despite a small proportion of greenfield development. Consequently, it is likely that Option B would have a minor positive impact on the landscape and would be the best performing option. On balance, a negligible effect is recorded for Option E given its likelihood of reducing potential for adverse effects on the landscape to a greater extent than Options A, C or D, but performing less strongly than the brownfield focus under Option B.

### **SA Objective 3 – Biodiversity, Flora, Fauna and Geodiversity**

- 3.3.11 Within Sandwell there are nine LNRs, forming key sections of the ecological network within the SLP area, in addition to the numerous SINC and SLINC. There are no SSSIs or NNRs within the borough, but both are present in neighbouring authorities close to the Sandwell Borough boundary. Areas of geological interest include Rowley Hills, Bumble Hole & Warrens Park LNR and Sandwell Valley Country Park. Over 50% of Sandwell's Green Belt land is described as having very high ecological value<sup>27</sup>. Some priority habitats and small areas of ancient woodland are also present in the borough. New development could place increased pressure on the biodiversity assets within and surrounding the urban area through increased development and visitor-related pressures.
- 3.3.12 In absence of specific locations of the proposed sites within the five spatial growth options, their exact impact on nearby biodiversity sites is uncertain, but the options do describe their approach to biodiversity which enables comparison. Option A aims to make improvements to, or allowances for, the environment in existing housing or residential sites, and to protect areas with ecological and geological value, and has recorded a minor positive impact on biodiversity. Options B and E aim to protect open spaces and areas of ecological value and create additional public open spaces within which there may be potential to increase biodiversity. Through the creation, protection and improvement of parks, woodland, open spaces and habitats, Options B and E would help to conserve and enhance habitats and ecological corridors within the urban area, improving resilience and adaptation to climate change. However, Option E does also include development of a small number of greenfield sites, and so may include some increased risk of disturbance to ecological networks compared to Option B.
- 3.3.13 Both Options C and D aim to protect areas of designated habitat or ecological value, but could also lead to the loss of open spaces and undeveloped land within the urban area which, although would likely not be of significant ecological value, could cumulatively reduce the amount of space and corridors available for wildlife within the urban area. Consequently, Options C and D have both recorded an uncertain impact on biodiversity overall.

<sup>27</sup> EcoRecord (2019) An Ecological evaluation of the Black Country Green Belt. Available at: <https://blackcountryplan.dudley.gov.uk/media/13896/an-ecological-evaluation-of-the-black-country-green-belt-final-report-2019-redacted.pdf> [Date accessed: 01/08/25]

- 3.3.14 All options aim to protect the environment; although, Option B is likely to be the best performing with regard to SA Objective 3. Option B is anticipated to have a major positive impact on biodiversity, as it aims to protect existing open spaces and areas of ecological value but also intends to create new spaces and habitats which would benefit biodiversity and help with adaptation to climate change. Option E includes the same protection and enhancement of open spaces and areas of ecological value as Option B, but also includes some greenfield development; therefore, a minor positive impact is identified for Option E.

#### **SA Objective 4 – Climate Change Mitigation**

- 3.3.15 The two largest sources of emissions in Sandwell are transport and domestic; however, in 2021 almost 30% of households within the borough did not own a car<sup>28</sup>. Investments in public transport, walking and cycling provisions could help to reduce transport emissions and provide better access across the borough without using privately owned transportation. It would be beneficial if this was complemented by improvements to the energy efficiency of homes, which could help to reduce domestic emissions.
- 3.3.16 Option A aims to make improvements to, or allowances for, climate change within existing residential and employment sites.
- 3.3.17 Option B would promote the use of zero and low-carbon designs, building techniques, materials and technologies in all new developments, and redevelop existing housing and employment areas to deliver cleaner and more energy efficient growth. This could help to reduce embodied carbon. Option E also seeks to deliver more energy efficient growth, and both Options B and E would further ensure that new development is located in areas with the best public transport access, helping to reduce reliance on private cars for travel. Through the creation of parks, woodland, open spaces and habitats across the borough, Options B and E would also help to increase GI coverage with carbon storage capacity and supporting other ecosystem services, maximising both climate change adaptation and mitigation.
- 3.3.18 Option C promotes the co-location of housing with existing and proposed employment areas, which could help to reduce the need to travel to work and encourage the use of sustainable travel options. However, as this option does not include specific reference to climate change or mitigation measures the exact impact this option would have on this SA Objective is uncertain.
- 3.3.19 Option D would aim to redevelop areas of existing older housing to provide higher density and energy efficient new housing, centred around public transport hubs. This could include retrofitting the existing building stock in the borough, further helping to reduce emissions; although, this may lead to the release of embodied carbon depending on the extent to which buildings could be refurbished rather than demolished and rebuilt.
- 3.3.20 Options A, D and E would help to promote climate change mitigation and, as such, have a minor positive impact. Option B is likely to be the best performing against climate change mitigation as it proposes the most modifications and technologies within new developments to help combat the effects of climate change and has been identified as producing a major positive impact on climate change mitigation.

<sup>28</sup> Sandwell Trends (2025) Housing and Car Ownership. Available at: <https://www.sandwelltrends.info/household-characteristics/>  
[Date accessed: 01/08/25]

**SA Objective 5 – Climate Change adaptation**

- 3.3.21 Given its mostly urban setting, Sandwell is likely to suffer from the ‘urban heat island’ effect, which may be made worse by new development in the borough. GI and open spaces can help urban areas adapt to climate change, by providing protection from extreme weather and helping to reduce the ‘urban heat island’ effect. Likewise, these functions could be compromised by greater urban density and loss of GI.
- 3.3.22 Sandwell is affected by flooding along the River Tame the River Stour and by surface water flooding, with all six wards having a history of flooding events. The introduction of new dwellings and impermeable surfaces can exacerbate surface water flooding, but implementation of adaptive technologies can help to mitigate this.
- 3.3.23 Option A aims to make improvements to, or allowances for, climate change within existing residential and employment sites, which would likely help adaptation to climate change. Option B would promote the use of zero and low-carbon designs, building techniques, materials and technologies in all new developments and redevelop existing housing and employment areas to deliver cleaner, more energy efficient and more intensive areas of growth. Option E similarly promotes energy efficient growth. Through the creation of parks, woodland, open spaces and habitats across the borough, with potential to increase the extent and quality of GI, both Options B and E also intend to maximise climate change adaptation and mitigation.
- 3.3.24 Option D would aim to redevelop areas of existing older housing to provide higher density and energy efficient new housing, with benefits to climate change adaptation and potentially reduced overall land-take compared to Options A and C, resulting in a lesser impact on flooding. The same can be said, although to a lesser extent, for Option E which promotes opportunities for higher density development in centres. Although Options A and D would include development on existing open spaces and/or undeveloped land within the urban areas, and Option E in a small number of greenfield locations, which could lead to an overall loss of GI, these three options have other adaptation measures, e.g. improving/redeveloping existing housing or employment sites, and as such a minor positive result in terms of climate change adaptation has been recorded for these options. As Option C option does not include specific reference to climate change or to climate change adaptation measures, the exact impact this option would have on climate change mitigation is uncertain.
- 3.3.25 Option B would be the best performing against climate change adaptation, with a major positive impact recorded, as it proposes the greatest focus on climate change adaptation and technologies within new developments, as well as conserving and enhancing GI, to help combat the effects of climate change.

**SA Objective 6 – Natural Resources**

- 3.3.26 The majority of land within Sandwell is classified as ALC ‘urban’; although, there are small pockets of non-agricultural land and a small amount of Grade 3 and 4 land in the northeast of the borough. There are no MSAs present in Sandwell.

- 3.3.27 Options A, B, C and D propose to keep new development within the existing urban area and, as such, they would not be expected to impact BMV agricultural land within the borough. All options also promote the use of previously developed land. However, Options A, C and D also propose allocating underused or vacant open space or previously undeveloped land within the urban area for new development, with potential to lead to a minor negative impact on natural resources associated with the loss of soil resource which may have environmental or ecological value.
- 3.3.28 Option E, while focusing growth in the existing urban area and promoting higher density development in centres, also includes potential for a small number of greenfield sites to be developed where there are opportunities for strategic levels of development. However, alongside this growth, the creation, protection and improvement of open spaces and GI would be maximised. While likely to minimise the loss of ecologically or agriculturally important soils, there remains potential for a minor negative effect on natural resources.
- 3.3.29 Option B only proposes to utilise brownfield and previously developed sites for development. As such, Option B could be described as the best performing and would be likely to have an overall minor positive impact on natural resources.

### **SA Objective 7 – Pollution**

- 3.3.30 Sandwell has a borough-wide AQMA, and for several years nitrogen dioxide (NO<sub>2</sub>) concentrations have exceeded legal limits in the borough<sup>29</sup>. The latest Air Quality Status Report (2024)<sup>30</sup> indicates that while air quality is generally improving, exceedances in the NO<sub>2</sub> national air quality objective remain in two monitoring locations. New development within the AQMA may lead to increased pollution levels from increased use of vehicles and would potentially expose residents to existing poor air quality. Soil and water pollution would depend on the nature, scale and location of the developments but there is potential for increased pollution through construction and occupation of the sites despite the intention within each option to “*protect areas of ... ecological value*”.
- 3.3.31 Options A and E aim to make improvements to the capacity of existing residential and employment areas with regard to the environment, climate change and accessibility, which may help to reduce pollution levels by promoting public transport and implementing mitigation measures.
- 3.3.32 Option B would promote the use of zero and low-carbon designs, building techniques, materials and technologies in new developments to help reduce emissions during the construction and occupation phases. Options B and E would also allocate housing and employment sites with good sustainable and public transport access, which would potentially help to reduce transport-associated emissions. Both options also propose to redevelop existing housing and employment sites to deliver cleaner, more energy-efficient areas of growth, which would help to minimise the generation of pollution from domestic and employment sources.

<sup>29</sup> Sandwell Metropolitan Borough Council (2020) Climate change strategy 2020-2041. Available at: <https://www.sandwell.gov.uk/climate-change-1/climate-change/3#:~:text=In%20recognition%20of%20the%20urgency.carbon%2Dneutral%20borough%20by%202041> [Date accessed: 01/08/25]

<sup>30</sup> Sandwell Metropolitan Borough Council (2024) 2024 Air Quality Annual Status Report (ASR). Available at: <https://www.sandwell.gov.uk/downloads/download/987/2024-air-quality-annual-status-report> [Date accessed: 01/08/25]

- 3.3.33 Option C would locate new housing and associated services, facilities and infrastructure to serve existing and proposed employment areas, which may help to reduce the need to travel, particularly commuting by private vehicle, and so reduce potential transport-associated emissions. Option D aims to provide high density and energy-efficient housing by redeveloping areas of existing older housing. This could include retrofitting the existing building stock in the borough, further helping to reduce emissions.
- 3.3.34 Despite the provisions within Options A, C and D to minimise the generation of pollution, overall, these developments would still introduce new development within an AQMA and lead to an increase in traffic to some extent. A minor negative impact on pollution could arise. Option B provides the most initiatives to help reduce pollution both in the construction and occupation of developments (including zero and low-carbon designs). Both Options B and E would locate new developments near to sustainable transport links, which may reduce commuting by private vehicle and associated levels of congestion and emissions within Sandwell. Therefore, Option B is likely to be the best performing option in terms of pollution and, on balance, could potentially have a minor positive impact on pollution overall, depending on the nature and design of new developments. An overall negligible impact is identified for Option E.

#### **SA Objective 8 – Waste**

- 3.3.35 It is expected that any new housing or employment development would create additional waste, potentially in both quantity and range of waste types produced. There is not sufficient information available to accurately predict the effect that each spatial growth option would have in terms of minimising waste generation, promoting the sustainable management of waste, or encouraging recycling and re-use of waste.
- 3.3.36 Option A would locate new development in areas where existing infrastructure has capacity or where capacity has been improved to accommodate the new development which is expected to include utilities and waste infrastructure. As such, Option A would likely have a minor positive impact on waste.
- 3.3.37 Option B emphasises the use of sustainable construction, including building techniques and materials, and would ensure all development uses previously developed and brownfield land. These principles would be likely to help minimise waste from the construction phase and promote re-use of materials where possible. As the exact use of sustainable construction methods are unknown at this time, the impact this option would have on waste is uncertain.
- 3.3.38 Option C would locate new housing and services, facilities and infrastructure to serve existing and proposed development sites. However, the focus on employment growth under Option C also means that this option could lead to a larger amount or greater range of waste types depending on the specific employment uses. This is likely to produce a minor negative impact as waste quantities may be increased.

- 3.3.39 Option D would promote higher densities of development and include the use of tall buildings. Higher densities of development could place increased demand on local waste management systems due to larger quantities and more diverse waste being generated in smaller areas, potentially leading to sanitation problems if a careful design is not implemented<sup>31</sup>. Therefore, this option could potentially have a minor negative impact on waste.
- 3.3.40 Option E would result in similar benefits as Option A in terms of locating new development in areas where existing infrastructure has capacity or where capacity has been improved to accommodate the new development; however, like Option D, Option E also includes some potential for higher density development, which could lead to challenges. The overall impact of Option E is uncertain.
- 3.3.41 Option A appears to be the best performing option with regard to waste (closely followed by Option E), as it proposes to locate development in areas with existing infrastructure capacity or where capacity has been improved to support development.

### **SA Objective 9 – Transport and Accessibility**

- 3.3.42 Sandwell is well served by a dense network of public transport, providing links regionally and nationally. Accessible public transport links are key to sustainable development and as transport is an enabler of economic activity, employment sites within, or close to, existing urban settings would potentially have access to a greater transport network to utilise and promotion of public transport or active travel may be more successful.
- 3.3.43 Options A and E propose to take advantage of existing and improved infrastructure to enable development on sites to be maximised. Options B and E aim to allocate housing in areas with high levels of sustainable transport to provide residents with sustainable access to services, and to allocate employment land where good public transport links are available. Option C aims to redevelop retail and other commercial areas in town centres to provide employment sites, allocate employment sites on derelict or vacant open space within the urban area and to locate housing and services close to existing and proposed employment areas. This could potentially reduce commuting times and so possibly reliance on private vehicles as the public transport network could be utilised by commuters. Options D and E would focus new growth within the existing residential and employment areas and around transport hubs so residents could utilise existing transport links, including public transport and active travel.
- 3.3.44 All the options propose to site new development in locations where the existing public transport network can be utilised, with a likely minor positive impact on transport and accessibility for Options A, C and D. Of the five options, Options B and E are identified as the joint best performing, as both options focus on targeting growth only where public transport links are best, which would likely encourage more residents to choose more sustainable travel options and result in a major positive impact on transport and accessibility.

<sup>31</sup> London Plan Density Research: Lessons from Higher Density Development. Available at: [https://www.london.gov.uk/sites/default/files/project\\_2\\_3\\_lessons\\_from\\_higher\\_density\\_development.pdf](https://www.london.gov.uk/sites/default/files/project_2_3_lessons_from_higher_density_development.pdf) [Date accessed: 18/10/23]

**SA Objective 10 – Housing**

- 3.3.45 Within Sandwell there has been an identified need for 26,350 homes over the Plan period to 2041<sup>32</sup>. Whilst the spatial growth options describe housing locations, they do not quantify housing numbers for each option; therefore, the extent to which they could contribute towards meeting the housing need in the borough is unknown. At this scale of assessment, it is also uncertain what the likely contribution of each growth option to meeting the different needs of the population on housing mix, provision of extra care housing, accessible housing and affordable homes would be.
- 3.3.46 Option A proposes to focus most new growth within the existing residential and employment areas on previously developed land and utilising existing and improved infrastructure capacity to maximise developments. Option B aims to restrict development to brownfield sites, promote low carbon designs and technologies in new development, and redevelop existing housing and employment areas to deliver more energy-efficient and intensive areas of growth. Option C proposes locating new housing and services where they serve existing and proposed employment areas. Option D aims to focus new growth within the existing residential and employment areas near existing transport hubs, utilising vacant and underused open spaces and undeveloped land within the urban areas. Option D would also redevelop areas of existing older housing to provide higher density and energy efficient housing and resolve any capacity gaps in residential services. Option E combines aspects of Option A (focusing most growth in existing residential and employment areas and maximising developments with existing and improved infrastructure capacity) and Option B (promoting redevelopment and energy efficiency), and additionally would consider opportunities for higher densities in centres and greenfield development where there are opportunities for strategic levels of development.
- 3.3.47 All the options propose new housing development but focused on different areas of Sandwell, leading to a minor positive impact on housing provision. Option D is likely to be the best performing with regard to housing as it has the largest focus on housing, and by increasing density may provide for the largest amount of housing growth. Option E is likely to perform second-best in this regard, with its inclusion of strategic housing opportunities in greenfield locations and higher density development in centres.

**SA Objective 11 – Equality**

- 3.3.48 Deprivation is high across the SLP area, with 36 LSOAs in Sandwell ranked among the 10% most deprived in England<sup>33</sup>. All options propose growth in urban areas which could potentially help facilitate social inclusion, increasing accessibility to key services and employment opportunities. However, increasing housing density in deprived areas could also lead to exacerbation of existing inequalities. In particular, Option D emphasises the use of increased housing densities and taller buildings, and to a lesser extent Option E includes potential for higher building densities in urban centres. This may lead to greater pressure on existing services and open spaces, with adverse implications for quality of life and more dense living situations which could potentially lead to higher crime rates.

<sup>32</sup> SMBC (2025) Sandwell Local Plan – Examination in Public. March 2025. Topic Paper – Housing. Available at: <https://www.sandwell.gov.uk/downloads/file/3925/sa-ed24-housing-topic-paper-final> [Date accessed: 28/08/25]

<sup>33</sup> Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 01/08/25]

- 3.3.49 Options A and E propose focusing new development in existing housing and employment areas, delivering most new development on previously developed land and taking advantage of existing and improved infrastructure capacity to maximise development. Options B and E would allocate housing and employment land in areas with good sustainable and public transport links to services including schools, jobs, healthcare and food stores, with Option B restricting new development to brownfield sites and Option E additionally including some limited greenfield development. Option C proposes to intensify existing employment areas through redevelopment and redesign and locating new housing and services to serve employment sites. Option D aims to deliver new housing in previously developed and potentially underused open space and redevelop existing older houses to provide higher density housing; this could help to promote regeneration and enhance deprived areas but may also lead to challenges associated with higher density living as outlined above.
- 3.3.50 Mixed effects could occur as a result of Options B, C, D and E, with an uncertain impact recorded; whereas, Option A is more likely to lead to a minor positive impact overall.
- 3.3.51 Option A is likely to be the best performing option with regard to equality, because it balances housing, employment and utilising existing and improved infrastructure.

#### **SA Objective 12 – Health**

- 3.3.52 Residents in Sandwell have generally good access to health facilities, with 73 healthcare centres<sup>34</sup> and Midland Metropolitan University Hospital located in the borough, and the majority of the urban area having good pedestrian and public transport access to healthcare.
- 3.3.53 All the spatial growth options seek to take advantage of existing facilities by directing the majority of new development to the existing urban areas where healthcare provisions are most concentrated. Options B, D and E aim to locate new developments close to transport links to enable residents to access services using public transport. Options B and E would ensure housing is only developed in areas with the highest accessibility to healthcare; whereas, Option D would focus growth around transport hubs and seek to fill healthcare capacity gaps. However, Options A, C and D all involve the potential of allocating vacant or under used open space for development, losing the potential to use these areas for open spaces and green links, and the associated benefits this could bring for human health and wellbeing. A minor negative impact is identified for Options A, C and D; although, Option D would likely perform better than Options A and C.
- 3.3.54 Option B could be identified as the best performing overall, closely followed by Option E, as both would allocate housing near transport links to residential services including healthcare and do not consider use of previously undeveloped open space within the urban areas, instead ensuring the protection of existing open spaces and creation of new open spaces for the public. Option E does additionally include some potential greenfield development, meaning a small proportion of residents may be further from healthcare facilities compared to Option B. A minor positive impact is identified overall for both options.

<sup>34</sup> According to GIS data provided by SMBC

**SA Objective 13 – Economy**

- 3.3.55 In Sandwell, the highest density of employment locations can be found in the centre and north of the borough and along key transport routes.
- 3.3.56 Options A and E aim to focus most new growth within the existing residential and employment areas, where sustainable transport options would be the best. Option E in particular seeks to allocate housing in areas with the highest levels of sustainable access to residential services including employment opportunities. Similarly, Option B proposes to locate new employment land near to good sustainable and public transport links, ensuring good sustainable access to workplaces. Options A, B and E would be likely to result in a minor positive impact on the economy.
- 3.3.57 Option D aims to deliver growth in existing residential and employment areas, and reallocate areas identified as employment land for additional housing development which could compromise employment land targets and lead to a minor negative impact on the economy.
- 3.3.58 Option C focuses on economic growth, aiming to retain, enhance and promote all types of employment land, intensify the use of employment land through redevelopment and redesign and locate new housing and services to serve employment sites. A major positive impact would be likely, making it the best performing option with regard to economy.

**SA Objective 14 – Education, Skills and Training**

- 3.3.59 The extent to which all spatial options would facilitate good access to education for new residents is almost entirely dependent on the specific location of the development, which is uncertain given the broad locations set out in the spatial growth options. Access to education, skills and training are generally best within urban centres. All the options propose the majority of growth within the existing urban areas, which would likely enable good access to education facilities.
- 3.3.60 Options B and E aim to only locate new residential development in areas with the highest levels of sustainable access to services, including schools. Whilst Option D promotes the highest housing densities, it also aims to improve capacity in associated residential services including education facilities, and focus development around sustainable transport hubs. Option E similarly seeks to promote higher densities in centres (i.e., generally the most accessible locations) and take advantage of existing and improved infrastructure capacity. Overall, Options B and E are likely to result in a minor positive impact on access to education, and Option D a major positive impact. The overall effect of Options A and C on access to education is uncertain, as although they remain largely urban-focused they may lead to over-capacity issues in some locations.
- 3.3.61 Overall, Option D would likely be best performing with regard to education, skills and training owing to the provision of sustainable access to schools and addressing capacity gaps, closely followed by Option E, which will be expected to maximise the proportion of new residents in proximity to schools.

**Conclusion**

- 3.3.62 **Table 3.4** below summarises the results of the high-level evaluation as discussed in the preceding narrative, using the scoring system as explained in **Chapter 2**.

- 3.3.63 It is difficult to determine an overall best performing spatial option as the performance of each option varies depending on the SA Objective in question. Generally, options which perform better against economic needs put the most pressure on environmental or social resources and vice versa.
- 3.3.64 Overall, in the high-level evaluation, Option B (Green Growth) performs best against the largest number of SA Objectives; it reduces the impacts on the environment whilst providing residential and employment growth. However, it is not clear exactly what level housing or employment growth could be attained under this option given its reliance only on previously developed land. Option E (Balanced Green Growth) includes similar provisions to Option B and performs second-best against several SA Objectives, and may out-perform Option B in terms of housing delivery given that Option E also looks to explore greenfield locations for strategic levels of development.
- 3.3.65 Option A (Balanced Growth) received mixed results, although was found to perform best against SA Objectives 8 (waste) and 11 (equality) owing to its focus on aligning growth with infrastructure.
- 3.3.66 Options C (Economic Growth) and D (Housing Growth) performed worst overall in terms of the number of SA Objectives against which minor negative or uncertain impacts were identified, although their focus on maximising growth saw them perform the best against SA Objectives 13 (economy) and 10 (housing) respectively.

**Table 3.4:** SA performance of the spatial growth options, including additional Option E

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Spatial Growth Option	Cultural heritage	Landscape	Biodiversity, flora, fauna and	Climate change mitigation	Climate change adaptation	Natural resources	Pollution	Waste	Transport and accessibility	Housing	Equality	Health	Economy	Education, skills and training
A	-	-	+	+	+	-	-	+	+	+	+	-	+	+/-
B	-	+	++	++	++	+	+	+/-	++	+	+/-	+	+	+
C	-	-	+/-	+/-	+/-	-	-	-	+	+	+/-	-	++	+/-
D	-	-	+/-	+	+	-	-	-	+	+	+/-	-	-	++
E	-	0	+	+	+	-	0	+/-	++	+	+/-	+	+	+

### 3.4 Selection and rejection

- 3.4.1 Section 5.6 of the Regulation 19 SA Report (2024) set out SMBC's reasons for selecting or rejecting each reasonable alternative spatial growth option identified, described, and evaluated during the SA process at the time of its preparation (replicated in **Box 3.1**).
- 3.4.2 Taking into account the new assessment findings, including the additional 'Balanced Green Growth' option (see **section 3.3** above), SMBC has provided the further commentary set out in **Box 3.2**.

**Box 3.2:** SMBC updated selection/rejection commentary on spatial growth options

No single option would have no adverse environmental or sustainability impact; however, it is clear from the summary assessment that two options (Housing-led and Employment-led) would not support the balanced and sustainable mix of development and environmental and social benefits required to deliver transformational change in Sandwell. It became apparent that the most appropriate and deliverable strategy for housing, employment and environmental protection and improvement in Sandwell, which would also

confirm our ambitions to improve the health and wellbeing of residents, would be a combination of options A and B.

A hybrid option (Option E) was therefore also tested, which is referred to as the Balanced Green Growth option throughout the SLP and supporting documents. It provides a significant quantum of housing and additional employment opportunities in the borough while at the same time promoting a bold strategy supporting the delivery of climate change adaptation and mitigation, environmental protection and enhancement, the conservation and enhancement of the historic environment and the delivery of infrastructure. This in turn supports the Council's wider aims and objectives in improving the health (physical and mental), wellbeing and life chances of people in Sandwell.

Option E combined the clear environmental and ecological focus of Option B (Green Growth) with the challenging and forward-looking growth objectives of Option A (Balanced Growth). This resulted in an approach that sought to maximise the delivery of housing and employment opportunities over the plan period in a way that respected and supported the local environment and sought to tackle climate change in a proactive way.

While Option B represented the best performing option in terms of the SA assessment of environmental impacts / benefits, the Council's remit required it to increase development levels beyond what would have been deliverable under Option B alone. For this reason, given the assessment of the reasonable alternatives including Options B and E it was determined on balance that Option E would reflect the Council's overall aims and objectives most closely.

## 4 Review of latest flood risk data

### 4.1 Background context

4.1.1 The Environment Agency's (EA) response to the SLP Regulation 19 consultation included comments in relation to the Regulation 19 SA and the SLP, requesting clarity on how the Sequential Test had been applied in the preparation of the SLP, and what flood risk data had been used to inform the SA and the SLP<sup>35</sup>.

4.1.2 As set out in SMBC's response to the Regulation 19 representations<sup>36</sup>, there is no statutory requirement for the SA itself to undertake the Sequential Test. Flood risk is one of several issues that has been considered at a high level in the SA process, including in the evaluation of reasonable alternative sites. SMBC appointed JBA Consulting to prepare a Level 1 Strategic Flood Risk Assessment (SFRA)<sup>37</sup> which was published in the evidence base for the Regulation 19 SLP consultation to provide detailed flooding information and set out how the Sequential Test can be applied by the plan makers. The Sequential Test itself was set out in Appendix E of SMBC's Site Assessment Report<sup>38</sup>.

4.1.3 The Regulation 19 SA concluded with regard to flood risk in Box 9.3: "*Assuming that the Sequential Test is passed, or the Exception Test is applied where required, and the recommendations of the SFRA are adopted, the SLP is expected to mitigate potential adverse impacts associated with development in areas at risk of fluvial or surface water flooding*".

### 4.2 New data post-Regulation 19

4.2.1 Since the Regulation 19 consultation, a Level 2 SFRA was prepared in December 2024 (final version published in January 2025)<sup>39</sup>. The Level 2 SFRA included a detailed assessment of flood risk, building on the Level 1 SFRA, and set out information needed to apply the Exception Test for those site allocations identified as requiring a Level 2 assessment.

<sup>35</sup> Letter from Keira Murphy (Environment Agency) to Philippa Smith (SMBC), 5 November 2024. Sandwell Local Plan – Regulation 19 Consultation. Comments from the Environment Agency. Available at: <https://sandwell.oc2.uk/readdoc/13/searchrepresentations/173> [Date accessed: 06/08/25]

<sup>36</sup> SMBC (2024) SA/ED2 – Regulation 19 representations received with SMBC's comments. Available at: <https://www.sandwell.gov.uk/downloads/file/3634/saed2-regulation-19-representations-received-with-smbc-s-comments> [Date accessed: 06/08/25]

<sup>37</sup> JBA (2024) Sandwell Metropolitan Borough Council Level 1 Strategic Flood Risk Assessment. September 2024. Available at: <https://www.sandwell.gov.uk/downloads/file/3242/sandwell-level-1-strategic-flood-risk-assessment-sfra-september-2024-> [Date accessed: 07/08/25]

<sup>38</sup> SMBC (2024) Sandwell Local Plan Site Assessment Report Appendix E: Flood Risk Sequential Test. Available at: <https://www.sandwell.gov.uk/downloads/file/3532/slp-reg-19-site-assessment-report-appendix-e-flood-risk-sequential-test> [Date accessed: 07/08/25]

<sup>39</sup> JBA (2025) Sandwell Level 2 Strategic Flood Risk Assessment (SFRA). Available at: <https://www.sandwell.gov.uk/planning-planning-policy/sandwell-local-plan-examination/4> [Date accessed: 07/08/25]

- 4.2.2 The Level 2 SFRA was prepared by JBA using the latest EA flood zone data available at the time of its preparation (March 2024). According to the SFRA “*The EA’s Flood Map for Planning (FMfP) flood zones were used to model Flood Zone 2 and Flood Zone 3 flood risk across the Level 2 sites. For Flood Zone 3b, the 3.3% and 2% AEP defended scenarios were used from EA modelling data. For areas outside of the detailed model coverage, Flood Zone 3a has been used as a conservative indication of Flood Zone 3b*”.
- 4.2.3 Since the Regulation 19 consultation, SMBC has been in liaison with the EA, and EA’s comments on the Level 2 SFRA have been responded to. Subsequent correspondence from the EA<sup>40</sup> indicated that the proposed amendments were satisfactory, and that their initial objections proposed in the Regulation 19 representation were withdrawn. No further comments were made in regard to the SA.
- 4.2.4 Nonetheless, **sections 4.3** and **4.4** explore the implications of the latest SFRA flood risk information in terms of reasonable alternatives, and SLP allocations.

### 4.3 Implications for the SA: reasonable alternative site assessments

- 4.3.1 In the SA process alongside the preparation of the SLP, each reasonable alternative site was appraised in terms of flood risk under SA Objective 5 (Climate Change Adaptation), which considered fluvial flood zones, indicative flood zone 3b, and surface water flood risk, as set out in the methodology in Appendix D of the Regulation 19 SA. The full reasonable alternative site assessments (pre-mitigation) were presented in Appendix E of the Regulation 19 SA.

- 4.3.2 The following paragraphs provide a summary of the assessment findings at Regulation 19 and a review of this assessment in light of the latest SFRA data. A summary of the assessment findings, using the high-level scoring system outlined in **Chapter 2**, is presented in **Table 4.1** below (updating Table E.6.1 from the Regulation 19 SA).

#### Fluvial Flood Zones

- 4.3.3 Regulation 19 SA: The majority of reasonable alternative sites scored positively owing to their location wholly within Flood Zone 1 where flood risk is low. However, nine sites (SH5, SH16, SH28, SH35, SH36, 132, SH59, SEC1-7 and SM2) were located largely or partially within Flood Zone 3; the proposed development at these nine sites could potentially have a major negative impact on flooding in the area. Additionally, a minor negative impact was identified for two sites (SH2 and 110) located partially within Flood Zone 2.
- 4.3.4 Review of SFRA data: The SA assessment was prepared using the EA’s FMfP data (2024). There is no change to the Regulation 19 SA assessment for fluvial flood zones when applying the data used in the Level 2 SFRA for Flood Zone 2 or 3.

<sup>40</sup> Email from Keira Murphy (Environment Agency) to SMBC, 20 February 2025. Sandwell Local Plan – Response to Representations made at Reg19 Stage – Environment Agency Comments. Available at: <https://www.sandwell.gov.uk/downloads/file/3948/sa-ed19-email-from-ea-200225-redacted> [Date accessed: 08/08/25]

**Indicative Flood Zone 3b**

4.3.5 Regulation 19 SA: While the majority of sites were not affected according to data provided by SMBC, five sites (SEC3-9, SH35, SH36, 110 and SH59) coincided with Indicative Flood Zone 3b (modelled during the previous SFRA process for the former Draft Black Country Plan<sup>41</sup>) where the proposed development could potentially have a major negative impact on flooding and exacerbate existing flood risk in Sandwell in the future due to climate change.

4.3.6 Review of SFRA data: Scenarios were modelled in the SFRA for Flood Zone 3b (3.3% AEP) plus Central climate change; and Flood Zone 3b (3.3% AEP) plus Higher Central (30%) climate change. Reasonable alternative sites have been reviewed to determine whether they are affected by either of these modelled zones. This has led to the following changes for the SA assessments:

- One site that was previously shown to lie within Indicative Flood Zone 3b (SEC3-9) now does not coincide with any new modelled flood zone outputs. A negligible impact is therefore identified for this site.
- The remaining four sites which were previously shown to lie within Indicative Flood Zone 3b (SH35, SH36, 110 and SH59) remain within the new modelled area indicating that the sites are likely to be at risk of fluvial flooding in the future owing to climate change. A major negative impact is therefore identified for these four sites, unchanged since the Regulation 19 SA.
- Seven further sites (SEC3-99, SH2, SH5, SH16, 132, SEC1-7 and SM2) which were previously located outside of the Indicative Flood Zone 3b area are now identified to lie within the new modelled Flood Zone 3b area, leading to potential major negative impacts owing to the risk of fluvial flooding in the future owing to climate change.

**Surface Water Flood Risk**

4.3.7 Regulation 19 SA: Some 36 reasonable alternative sites were found to coincide with an area of 'high' risk (1 in 30) where the proposed development could potentially have a major negative impact on surface water flooding in the area, as development will be likely to locate site end users in areas at high risk of surface water flooding as well as exacerbate flood risk in surrounding locations. Additionally, a minor negative impact was identified for a further 52 sites that coincided with areas of 'low' and/or 'medium' risk (1 in 1,000 / 1 in 100). Sites which did not coincide with any significant areas of surface water flood risk were recorded as negligible.

4.3.8 Review of SFRA data: The SA assessment was prepared using the EA's surface water flood risk extent data (2024). There is no change to the Regulation 19 SA assessment for surface water flood risk when applying the data used in the Level 2 SFRA for surface water flood risk extent.

<sup>41</sup> JBA (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment, 25<sup>th</sup> June 2020. Available at: <https://www.sandwell.gov.uk/downloads/file/3255/black-country-plan-level-1-strategic-flood-risk-assessment-sfra-june-2020-> [Date accessed: 11/08/25]

**Table 4.1:** Impact matrix for reasonable alternative sites against SA Objective 5 – Climate change adaptation  
(update to Table E.6.1 in Appendix E of the Regulation 19 SA)

Site Reference	Site Use	Fluvial Flood Zones (R19 SA 2024 – unchanged)	Indicative Flood Zone 3b (R19 SA 2024 – superseded)	Modelled Flood Zone 3b (New data from SFRA 2025)	Surface Water Flood Risk (R19 SA 2024 – unchanged)
SEC3-181	Employment	+	0	0	-
SEC4-1	Employment	+	0	0	--
SEC3-9	Employment	+	--	0	-
SEC3-99	Employment	+	0	--	-
SH1	Housing	+	0	0	0
SEC3-113	Employment	+	0	0	-
SEC3-46	Employment	+	0	0	--
SEC3-175	Employment	+	0	0	0
SEC3-36	Employment	+	0	0	-
SEC3-29	Employment	+	0	0	-
SEC3-148	Employment	+	0	0	--
SH2	Housing	-	0	--	--
SEC4-4	Employment	+	0	0	0
SEC3-191	Employment	+	0	0	--
SEC4-3	Employment	+	0	0	-
SEC3-133	Employment	+	0	0	-
SEC3-189	Employment	+	0	0	-
SEC3-22	Employment	+	0	0	-
SEC3-40	Employment	+	0	0	--
SEC1-4	Employment	+	0	0	--
SH3	Housing	+	0	0	--
SH4	Housing	+	0	0	0
SH5	Housing	--	0	--	--
SH6	Housing	+	0	0	-
SH7	Housing	+	0	0	-
SH8	Housing	+	0	0	0
SH9	Housing	+	0	0	-
SH62	Housing	+	0	0	-
SH10	Housing	+	0	0	0
SH11	Housing	+	0	0	-
35	Housing	+	0	0	-
36	Housing	+	0	0	-
38	Housing	+	0	0	0
40	Housing	+	0	0	-
42	Housing	+	0	0	-
43	Housing	+	0	0	0
44	Housing	+	0	0	-
45	Housing	+	0	0	0
46	Housing	+	0	0	0
SH13	Housing	+	0	0	-
SH14	Housing	+	0	0	--
SH15	Housing	+	0	0	-
SEC3-79	Employment	+	0	0	-
SH16	Housing	--	0	--	-
SH17	Housing	+	0	0	-
SH18	Housing	+	0	0	--
SEC3-193	Employment	+	0	0	-

Site Reference	Site Use	Fluvial Flood Zones (R19 SA 2024 – unchanged)	Indicative Flood Zone 3b (R19 SA 2024 – superseded)	Modelled Flood Zone 3b (New data from SFRA 2025)	Surface Water Flood Risk (R19 SA 2024 – unchanged)
SH19	Housing	+	0	0	-
SH20	Housing	+	0	0	-
SH21	Housing	+	0	0	0
SH22	Housing	+	0	0	-
SH23	Housing	+	0	0	-
63	Housing/Employment	+	0	0	0
SH24	Housing	+	0	0	0
SH25	Housing	+	0	0	--
SH26	Housing	+	0	0	--
SH27	Housing	+	0	0	-
SH28	Housing	--	0	0	-
SH29	Housing	+	0	0	--
71	Housing	+	0	0	0
74	Housing/Employment	+	0	0	-
SH30	Housing	+	0	0	-
SH31	Housing	+	0	0	--
SH32	Housing	+	0	0	0
SH33	Housing	+	0	0	-
SH34	Housing	+	0	0	0
SH35	Housing	--	--	--	--
SH36	Housing	--	--	--	-
SH37	Housing	+	0	0	--
SEC3-66	Employment	+	0	0	-
SH38	Housing	+	0	0	--
SM1	Mixed-use	+	0	0	-
SH40	Housing	+	0	0	--
SH41	Housing	+	0	0	--
SH42	Housing	+	0	0	-
SEC1-3	Employment	+	0	0	-
110	Housing	-	--	--	0
118	Housing	+	0	0	-
120	Housing	+	0	0	0
132	Housing	--	0	--	--
137	Housing	+	0	0	0
140	Housing	+	0	0	0
142	Housing	+	0	0	0
SH43	Housing	+	0	0	-
SH44	Housing	+	0	0	0
SH47	Housing	+	0	0	--
SM3	Mixed-use	+	0	0	-
SH49	Housing	+	0	0	--
SM4	Mixed-use	+	0	0	--
SH50	Housing	+	0	0	0
SH51	Housing	+	0	0	-
SM5	Mixed-use	+	0	0	0
SM6	Mixed-use	+	0	0	-
SM7	Mixed-use	+	0	0	--
SH52	Housing	+	0	0	0
SM8	Mixed-use	+	0	0	-

Site Reference	Site Use	Fluvial Flood Zones (R19 SA 2024 – unchanged)	Indicative Flood Zone 3b (R19 SA 2024 – superseded)	Modelled Flood Zone 3b (New data from SFRA 2025)	Surface Water Flood Risk (R19 SA 2024 – unchanged)
SH53	Housing	+	0	0	-
SH54	Housing	+	0	0	--
SH55	Housing	+	0	0	--
SH56	Housing	+	0	0	0
SH57	Housing	+	0	0	--
SH58	Housing	+	0	0	-
SG1	Gypsy & Traveller	+	0	0	--
188	Housing	+	0	0	0
189	Housing	+	0	0	0
SH59	Housing	--	--	--	-
191	Housing	+	0	0	-
SH61	Housing	+	0	0	--
SEC1-1	Employment	+	0	0	--
SEC1-8	Employment	+	0	0	0
SEC1-5	Employment	+	0	0	--
SEC1-6	Employment	+	0	0	--
SEC1-2	Employment	+	0	0	-
SEC1-7	Employment	--	0	--	--
SM2	Mixed-use	--	0	--	--
SH45	Housing	+	0	0	--
SH63	Housing	+	0	0	-
SH65	Housing	+	0	0	0
SH64	Housing	+	0	0	0
SH66	Housing	+	0	0	0

### Post-mitigation site assessments

- 4.3.9 The process which has been used to appraise reasonable alternative sites 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.
- 4.3.10 The full reasonable alternative site assessments (post-mitigation) were presented in Appendix G of the Regulation 19 SA. Table G.3.5 provided a commentary on the identified adverse effects and SLP policy mitigation for SA Objective 5 (Climate Change Adaptation) and concluded that “*Assuming that the Sequential Test is passed, or the Exception Test is applied where required, these policies are expected to mitigate potential adverse impacts associated with development in areas at risk of fluvial or surface water flooding*”.

## 4.4 Implications for the SA: conclusion regarding flood risk

- 4.4.1 Flood risk was one aspect discussed in Chapter 9 (Climatic Factors) of the Regulation 19 SA. Drawing on the site assessments described in **section 4.3** above, the SA reported that eight housing-led allocations (SH2, SH5, SH16, SH28, SH35, SH36, SH59 and SM2) and one employment-led allocation (SEC1-7) were partially located within Flood Zones 2 and 3. Four allocated sites (SEC3-9, SH35, SH36 and SH59) coincided with areas of Indicative Flood Zone 3b. Some 78 allocated sites coincided with varying extents of surface water flood risk (34 of which with areas of high risk).

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- 4.4.2 Drawing on the review of SFRA data, this information has changed only with respect to indicative flood zones, where now nine allocations (SEC3-99, SH2, SH5, SH16, SH35, SH36, SH59, SEC1-7 and SM2) have now been identified to coincide with modelled areas of Flood Zone 3b in light of climate change.
- 4.4.3 This is reflected in the potential cumulative effects that were identified in relation to flood risk, in the context of climate change (see Table 16.1 of the Regulation 19 SA). The scale of proposed development in the SLP has potential to result in a cumulative increase in greenhouse gas emissions (associated with construction, energy demand, and transport) which may in turn contribute to increased extreme weather events and flood risk over time.
- 4.4.4 Following consideration of national and local policy, including Policy SCC5 (Flood Risk) and SCC6 (Sustainable Drainage), and drawing on the findings of the SFRA that were available at the time of preparation (i.e., the Level 1 SFRA), the Regulation 19 SA concluded that *“Assuming that the Sequential Test is passed, or the Exception Test is applied where required, and the recommendations of the SFRA are adopted, the SLP is expected to mitigate potential adverse impacts associated with development in areas at risk of fluvial or surface water flooding”*.
- 4.4.5 SMBC has confirmed that the Sequential Test has been carried out and Exception Test applied where required for allocated sites in the SLP, taking on board feedback provided by the EA<sup>42</sup>. The EA has confirmed the approach taken is satisfactory but recommended that site-specific assessments should be carried out at the planning application stage for certain sites to assess the risk and help determine if the Exception Test is necessary for any further sites<sup>43</sup>.
- 4.4.6 Taking this into account, the conclusions of the Regulation 19 SA remain unchanged. The new SFRA information does not result in any change to the residual effects of the SLP as identified in the Regulation 19 SA Report (2024).

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<sup>42</sup> SMBC (2024) Sandwell Local Plan Site Assessment Report Appendix E: Flood Risk Sequential Test. Available at: <https://www.sandwell.gov.uk/downloads/file/3532/slp-reg-19-site-assessment-report-appendix-e-flood-risk-sequential-test> [Date accessed: 07/08/25]

<sup>43</sup> Email from Keira Murphy (Environment Agency) to SMBC, 20 February 2025. Sandwell Local Plan – Response to Representations made at Reg19 Stage – Environment Agency Comments. Available at: <https://www.sandwell.gov.uk/downloads/file/3948/sa-ed19-email-from-ea-200225-redacted> [Date accessed: 08/08/25]

## 5 Conclusion

### 5.1 Overview of findings

5.1.1 This SA document has been prepared at the request of the Inspector during the Week 1 EiP Hearings, to provide:

- An evaluation of the 'Hybrid Balanced Green Growth' spatial growth option that forms SMBC's chosen spatial strategy approach as set out in the Regulation 19 Publication Version of the SLP<sup>44</sup> in line with the previously assessed options in the SA process; and
- Consideration of implications of the latest flood risk information on site allocations within the SLP, derived from the Level 2 SFRA that was published after the Regulation 19 SA.

5.1.2 As discussed in **Chapter 3**, the additional spatial growth option (Option E – Hybrid Balanced Green Growth) performs well against the SA Objectives, ranking joint-best for SA Objective 9 (Transport and Accessibility) and second-best for several others including SA Objectives 2 (Landscape), 7 (Pollution), 8 (Waste), 10 (Housing), 12 (Health) and 14 (Education). However, Option B (Green Growth) remains the best performing option overall. After reviewing the updated SA assessment of spatial growth options, SMBC has confirmed that Option E remains the preferred approach, as it balances the ambition for growth with the environmental priorities of Option B.

5.1.3 Following a review of flood risk data from the SFRA process (see **Chapter 4**), the modelled extent of Flood Zone 3b under climate change scenarios has resulted in changes to the scoring of several site assessments in the SA (pre-mitigation). For example, Site SEC3-9 has shifted from a major negative to a negligible impact rating, as it no longer coincides with modelled flood zones. Conversely, several reasonable alternative sites (SEC3-99, SH2, SH5, SH16, 132, SEC1-7, and SM2) have shifted from negligible to major negative impacts, as they now fall within the modelled Flood Zone 3b area. Despite these adjustments, there is no change to the post-mitigation assessment of reasonable alternative sites or the evaluation of proposed SLP site allocations. Accordingly, the overall findings of the Regulation 19 SA in relation to flood risk remain unchanged.

5.1.4 Overall, the information presented in this SA Addendum does not alter the residual effects of the SLP as identified in the Regulation 19 SA Report (2024).

### 5.2 Next steps

5.2.1 The Week 2 EiP Hearings have been scheduled to commence on Tuesday 23<sup>rd</sup> September 2025.

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

<sup>44</sup> SMBC (2025) Sandwell Local Plan – Proposed Main Modifications Consultation Document (Regulation 19)

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

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