

4 Assessment of Employment Growth Options

4.1 Preface

- 4.1.1 Paragraph 81 of the NPPF states that “*significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*”, whilst PPG indicates that “*strategic policy-making authorities will need to prepare a robust evidence base to understand existing business needs, which will need to be kept under review to reflect local circumstances and market conditions*”³⁹.
- 4.1.2 Sandwell is located within the Black Country Functional Economic Market Area (FEMA) which also covers the local authorities of Dudley, Walsall and Wolverhampton. The Black Country Economic Development Needs Assessment (EDNA) and Black Country Employment Area Review (BEAR) are the key pieces of evidence relating to employment land need and supply. As the employment land assessment continues to be carried out jointly across the Black Country, the apportionment of land demand / supply is still the subject of discussion between the four councils, three of whom are not at the same stage of plan preparation as Sandwell. As a result, it is currently difficult to identify a clear set of figures for Sandwell’s need and supply.
- 4.1.3 Four options for the quanta of employment growth have been identified by SMBC, drawing on evidence from the EDNA (see **Table 4.1**).

Table 4.11: Sandwell Employment Growth Options identified by SMBC

Option	Description of Employment Growth Option	Employment Land (ha)
A	Rely on existing vacant employment land supply (do nothing)	29
B	Provide for highest estimate of need (EDNA)	238
C	Provide for lowest estimate of need (EDNA)	132
D	Provide for mid-range estimate of need (EDNA August 2023 update)	185

- 4.1.4 **Table 4.2** summarises the likely impacts of each employment growth option in relation to the 14 SA Objectives. The text within **section 4.2** sets out the accompanying assessment narrative which explains how each overall impact was identified.
- 4.1.5 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by SMBC, as well as expert judgement.

³⁹ DLUHC and MHCLG (2020) Planning Practice Guidance. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [Date accessed: 20/10/23]

Table 4.22: Impact matrix of the four employment growth options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Employment 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	+/-	0	0	-	+/-	+	-	+/-	+/-	0	-	0	+	+
B	+/-	-	-	-	+/-	-	-	+/-	+/-	0	+/-	-	++	+
C	+/-	-	-	-	+/-	-	-	+/-	+/-	0	+/-	-	++	+
D	+/-	-	-	-	+/-	-	-	+/-	+/-	0	+/-	-	++	+

4.2 Assessment

SA Objective 1 – Cultural Heritage

4.2.1 Within Sandwell there are two Grade I, eight Grade II* and 195 Grade II Listed Buildings, seven SMs, nine CAs and five RPGs. There are also a range of historic character areas and areas of historic townscape / landscape value identified within the borough⁴⁰. Development in close proximity to cultural heritage features has the potential to adversely affect their significance or setting. It is likely that Option A which utilises existing vacant employment land would focus any development in areas already characterised by employment uses and as such any new development may be in keeping with the existing built form, and may also help to promote regeneration with benefits to areas with historic interest or architecture, to a greater extent than Options B, C and D. Option B could potentially have the most potential to lead to adverse effects on heritage receptors, given that this option proposes the highest amount of employment floorspace. However, as the site context and proximity to receptors is unknown at this time the potential impacts of all the employment growth options on cultural heritage features are uncertain.

⁴⁰ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf [Date accessed: 20/10/23]

SA Objective 2 – Landscape

- 4.2.2 Although the borough is highly urbanised, it also contains undeveloped areas including Green Belt to the north-east of the borough. The landscape of the borough's Green Belt is largely described as low or low-moderate sensitivity to development although open landscapes within the borough are important for maintaining separation between settlements⁴¹. One area in Sandwell Valley is described as having moderate-high sensitivity. Within the urban areas, Sandwell's history and industrial legacy provides distinctive character and a sense of local identity. Urban green spaces also provide benefits to the local character.
- 4.2.3 Whilst the specific location and context of the proposed employment sites for Options B, C and D are unknown, it is likely that development outside of the existing development boundaries would be required to some extent, leading to a potential negative impact on the landscape. Option A utilises existing vacant employment land so could help to focus new growth within areas already characterised by employment land uses, meaning that new development would likely be in keeping with the existing build form to a greater extent than Options B, C or D. On balance, a negligible impact would be likely for Option A. Options B, C and D require substantially more land and it is likely that some of this land would be outside the existing urban areas with 132ha for Option C, 185ha for Option D and 238ha for Option B; therefore, a potential minor negative impact on landscape is identified for these three options, with Option B's larger scale of growth potentially placing the most pressure on sensitive landscapes.

SA Objective 3 – Biodiversity, Flora, Fauna and Geodiversity

- 4.2.4 Within Sandwell there are nine LNRs, forming key sections of the ecological network within the SLP area in addition to the numerous SINCs and SLINCs. 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 value⁴². Some priority habitats and small areas on ancient woodland are also present in the borough.

⁴¹ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 10/10/23]

⁴² 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: 17/10/23]

- 4.2.5 Urban areas can support distinctive habitats, species, ecological links and GI, and there may be some loss of previously undeveloped land or brownfield land with ecological value within the urban area with these four options. However, Option A relies on utilising existing vacant employment land and as such may have less of an impact on biodiversity than Options B, C or D which would likely require previously undeveloped land to be utilised, to some extent. As Option A requires the smallest amount of land, and assuming this land will be previously developed, this option may lead to an overall negligible impact on biodiversity. Options B, C and D require substantially more land, likely including use of previously undeveloped land, so have potential to cause a greater impact on biodiversity .
- 4.2.6 It should be noted that BNG provisions and other policy requirements may help to reduce or offset these adverse effects to some extent and result in positive longer term effects, however at the landscape scale this level of growth could cumulatively lead to a reduction in the available space for wildlife and loss of corridors or connections between habitats. On balance, a minor negative impact is identified for Options B, C and D.

SA Objective 4 – Climate Change Mitigation

- 4.2.7 It is likely that all four options would have the potential to increase carbon emissions during the construction and occupation of the employment sites. As the location of employment growth under each option is not known, the potential for employees to utilise existing public transport routes to commute to work is uncertain. Since Option A utilises existing vacant employment land which is likely to be within the urban area, this option could provide better access to existing public transport links. However, it would also be expected that there would be an increase in the use of private cars to commute, potentially increasing congestion and pollution in the area given that Census data indicates 53% of Sandwell’s residents travel to work by driving a car or van⁴³. Furthermore, depending on the type of employment land, new development may lead to increased journeys by Heavy Goods Vehicles (HGVs) with higher emissions. A minor negative impact is identified for all options. Option A requires the smallest amount of employment growth and so could potentially lead to a smaller impact on climate change. Option B requires the largest amount of growth, followed by Option C, then Option D, all of which could lead to more significant impacts on climate change, depending on the scale, nature and design of new developments.

⁴³ ONS (2022) Travel to work, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/traveltoworkenglandandwales/census2021> [Date accessed: 20/10/23]

SA Objective 5 – Climate Change adaptation

- 4.2.8 As the location of the employment sites for each option is not known their effect on flooding is uncertain, although Option A utilises existing vacant employment land which is likely to be situated within the existing urban area. However, with all the options it is likely there would be an increase in the urban density or area which would then increase the extent of impermeable surfaces and so potentially increase the risk of surface water flooding. It is possible to incorporate GI or adaptive technologies into development design to mitigate for this increased impermeable surfacing but at this stage these details are not known. The identified impact for all four options is therefore uncertain and would depend upon implementation.

SA Objective 6 – Natural Resources

- 4.2.9 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 north east of the borough. BMV land would not be lost if development was focused within the urban area. There are no MSAs present in Sandwell. The location and site context of the employment sites are not known so the impacts the four options will have on natural resources are uncertain, but given the likelihood that Options B, C and D would require the use of previously undeveloped land, a minor negative impact on natural resources is identified. Option A proposes to utilise existing vacant employment land, potentially an effective use of this vacant land, and possibly including the use of remediated contaminated land, as such a minor positive impact could be achieved against this SA Objective.

SA Objective 7 – Pollution

- 4.2.10 Sandwell has a borough-wide AQMA, and for several years nitrogen dioxide concentrations have exceeded legal limits in seven monitoring stations across the borough⁴⁴. Commuting to employment sites may increase air pollution, however as the location of the sites is not known, the extent to which public transport or active travel routes could be promoted and utilised by commuters instead of private cars is uncertain. Soil and water pollution impacts will depend on the nature, scale and location of developments which are unknown at this time although Options B, C and D would likely result in a greater extent of previously undeveloped land being used compared to Option A. Overall, there is potential for increased pollution through the construction and occupation of development under all options to some extent, and so a minor negative impact would be expected. It is likely Option A would have the smallest impact as it proposes the smallest amount of land and would utilise existing vacant employment land. Option B would be likely to have the largest impact as it proposes the largest amount of land and may create the largest number of new journeys to the sites.

⁴⁴ 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: 18/10/23]

SA Objective 8 – Waste

- 4.2.11 It is expected that employment growth would also equate to increased waste production both in quantity and range of waste types produced. As the specific site locations and the proposed nature of the developments are unknown, the exact impacts on waste production are uncertain, and it is not known whether the developments would be situated in close proximity to existing waste management infrastructure. Option A proposes the smallest amount of floorspace so could produce the smallest increase in waste compared to the other options. Option B has the largest floorspace requirement and as such could produce the most additional waste. However, without knowledge of the employment uses to be carried out at new development sites, the overall impact on waste is uncertain.

SA Objective 9 – Transport and Accessibility

- 4.2.12 Sandwell is well served by a dense network of public transport infrastructure, providing links regionally and nationally. Transport is an enabler of economic activity, and employment sites within or close to existing urban settings would potentially have better access to a range of transport options, and promotion of public transport or active travel may be more successful. Conversely, additional employment land may lead to more private cars being used for commuting potentially increasing congestion and pollution in the area. As the locations of the employment sites within the growth options and any potential associated infrastructure improvements that would be provided alongside development are not known, their exact impact on public transport capacity and congestion are uncertain. Nonetheless, it could be expected that Option A would produce fewer new journeys owing to its smaller scale of proposed growth, potentially leading to less congestion and transport issues than Options B, C and D.

SA Objective 10 – Housing

- 4.2.13 This assessment considers employment growth options. It is expected that housing provision would not be affected either by the loss of existing housing or compromised housing delivery from these employment growth options. Consequently, a negligible impact on housing would be expected from all four employment options.

SA Objective 11 – Equality

- 4.2.14 Deprivation is high across the SLP area, with 36 LSOAs in Sandwell ranked among the 10% most deprived in England⁴⁵. Employment growth in urban areas could potentially help facilitate social inclusion increasing accessibility to key services and employment opportunities. However, increasing the density of development in deprived areas could also lead to exacerbation of existing inequalities, and could potentially put increased pressure on existing open spaces.
- 4.2.15 As the specific site context and proximity to receptors of the proposed employment land is unknown at this stage, there is some uncertainty regarding the potential impacts of all employment growth options on equality.

⁴⁵ 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: 11/08/23]

- 4.2.16 Although Option A would direct growth to vacant employment land, potentially helping to promote redevelopment, this option would not meet the identified employment need in the borough and would be more likely to lead to a minor negative impact overall for this SA Objective. Options B, C and D could potentially meet the identified need, depending on the estimate used, but there is more uncertainty regarding the exact impacts of these options as the location of the employment sites is unknown.

SA Objective 12 – Health

- 4.2.17 The location of employment development under each growth option is not known but it is not expected to affect the provision of healthcare facilities.
- 4.2.18 Parks and green spaces are important for human health, 24% of Sandwell is made up of green space⁴⁶. The four employment options could potentially place more pressure on these green spaces either through increased use or pressure to utilise green spaces for employment development. It would be expected that Option A would have a negligible effect on green spaces, since this option would focus growth on existing vacant employment land and would be unlikely to significantly affect green spaces. Options B, C and D may have a minor negative impact as although the specific locations of the developments are unknown, they have potential to adversely affect green spaces and require the use of undeveloped land.

SA Objective 13 – Economy

- 4.2.19 Sandwell lies within the Black Country FEMA. In Sandwell, the highest density of existing employment locations can be found in the centre and north of the borough and along key transport routes. Employment development near existing employment locations may benefit from existing infrastructure and transport links and could provide additional benefits to the area, driving economic growth. It is assumed that employment growth would provide more job options and opportunities providing benefits to the local population.
- 4.2.20 Option A provides the lowest quanta of new employment land and would not meet the employment land need identified in the EDNA; as such, a minor positive impact is recorded. Option B would provide employment land to meet the lowest estimate of need according to the EDNA, Option D the mid-range estimate, and Option B the highest estimate. As such, all three options could meet the identified needs, depending on the estimate used, with potential to result in a major positive impact on the economy. Option B would provide for the highest estimate of employment land need, likely delivering a larger number and range of jobs so would be the best performing option for this SA Objective.

⁴⁶ Sandwell Metropolitan Borough Council Green Space Strategy 2010 – 2020. Available at: https://www.sandwell.gov.uk/download/downloads/id/24989/april_2017_-_parks_and_green_spaces_strategy_document.pdf [Date accessed: 11/08/23]

SA Objective 14 – Education, Skills and Training

- 4.2.21 It is expected that employment development would not impact the provision of or access to schools. There is potential for the employment development to provide opportunities to develop skills, provide training, and potentially jobs or apprenticeships to school leavers. Consequently, all four options would be likely to have a minor positive impact on education, skills and training.

4.3 Conclusion

- 4.3.1 There is uncertainty regarding the exact impacts that each employment growth option would have owing to the unknown scale and nature of the developments, and the options can act differently against each of the SA Objectives meaning identifying a single best performing option is difficult.
- 4.3.2 Option B proposes the highest amount of employment land (238ha), and as such performs best against economic objectives, but performs less well against environmental objectives as it would be likely to require the greatest extent of previously undeveloped land. Conversely, Option A performs best against environmental objectives owing to its focus on existing vacant employment land but less well against economic objectives as it would not fulfil Sandwell’s identified employment land need.
- 4.3.3 Option C would provide for the lowest estimate of need according to the EDNA (132ha), and Option D would provide for the mid-range estimate of need (185ha). As such, both options C and D would lead to similar impacts in terms of balancing employment land delivery with reducing potential for adverse effects associated with higher growth targets.
- 4.3.4 Overall, Option C could be considered as the best performing against all the objectives collectively as it provides enough land to meet the lower estimate of need, performs well against the economic objectives and although having negative impacts against the environmental objectives would likely have less of an impact than Option B.

4.4 Selection and Rejection

- 4.4.1 Reflecting on the SA findings (as set out in **section 4.3**) and SMBC’s objectives for the emerging SLP, the Council consider that:
- 4.4.2 *“Option B performs best against economic objectives but performs less well against environmental objectives as it requires the most land; conversely, Option A performs best against environmental objectives owing to its focus on existing vacant employment land but less well against economic objectives and it does not fulfil Sandwell’s identified employment need. Option C would be deliverable. Option D is also considered to be appropriate and deliverable; it will provide for additional growth but without the potential environmental impacts of Option B.*
- 4.4.3 *As such, Option D appears to perform best against all the objectives collectively as it provides enough land to deliver more than the lowest estimate of need, performs well against the economic objectives and although having negative impacts against environmental objectives, is likely to have less of an impact than Option B. Some of the environmental impacts could also be mitigated through the design of developments’.*