7   Assessment of policies

7.1   Preface

7.1.1   The SLP will contain strategic and non-strategic planning policies and allocations to support the growth and regeneration of Sandwell up to 2041. The SLP Draft Plan Regulation 18 Consultation document presents a suite of draft policies for inclusion in the emerging SLP.

7.1.2   Many of the proposed SLP policies are derived from the ceased Draft BCP. A total of 63 policies were set out in the Draft BCP and were consulted on as part of the BCP process, before the decision was made to end work on the BCP in October 2022. A number of SLP policies have also been derived from the adopted Sandwell SAD.

7.1.3   SMBC have considered the extent to which each of the draft BCP policies and adopted SAD policies remain relevant and applicable to the SLP area, in light of consultation responses received during the BCP Regulation 18 consultation, and in the context of the latest national and local guidance and strategies.

7.1.4   The relevant existing policies have been updated and together with a number of new policies prepared for the SLP, this has resulted in a total of 87 policies identified and presented within the Draft SLP Regulation 18 Consultation document. The SLP also sets out a Vision for Sandwell in 2041 and a set of Objectives.

7.1.5   The sustainability performance of each draft policy has been evaluated based on the SA Framework (see **Appendix A**) and the methodology as set out in **Chapter 2**. The assessments are set out in full within **Appendix D**. This chapter summarises the results of these assessments.

7.2   Overview of policy assessments

7.2.1   The impact matrix for all policy assessments is presented in **Table 7.1**, and the Vision and Objectives in **Table 7.2**. These impacts should be read in conjunction with the assessment text narratives in **Appendix D**.

7.2.2   The proposed SLP policies seek to support the delivery of sustainable growth within Sandwell. The policies will help to ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the SLP are avoided, mitigated or subject to compensatory measures wherever possible and that development proposals are accompanied by relevant supporting information to ensure that the impacts of development can be appropriately factored into land use decision making processes.

7.2.3   The SLP policies cover the themes of:

- Development strategy;
- Sandwell's natural and historic environment;
- Climate change;
- Health and wellbeing in Sandwell;
- Sandwell's housing;
- Sandwell's economy;

- Sandwell's Centres;
- West Bromwich;
- Transport;
- Infrastructure and delivery;
- Waste and minerals;
- Development constraints and industrial legacy; and
- Development management.

7.2.4 The assessment of the SLP Vision and the 18 SLP Objectives has identified negligible, minor positive and majority positive effects. The Vision and Objectives set a positive framework for the SLP as a whole.

7.2.5 For the majority of SLP policies, the assessment has identified negligible, minor positive or major positive effects. Negligible impacts are identified where the policy does not directly influence the achievement of that SA Objective, which is the case for many of the more 'thematic' policies.

7.2.6 A greater range of sustainability effects is identified for policies that have potential to introduce new development, for example, the housing and economy policies. Policy SDS1 sets out the broad direction for growth. As such, minor negative impacts have been identified for SA Objectives 7 (Pollution) and 8 (Waste), owing to the potential for the large amount of proposed development to lead to increases in pollution and waste.

7.2.7 Uncertain impacts have been identified for certain SA Objectives as a result of some of the policies in the housing and economy policies. The range in potential impacts for these policies owes to the fact that large developments could have significant adverse effects, however, the policy requirements have the ability to ensure these developments create some positive impacts or reduce the potential adverse effects if designed and carried out appropriately.

7.2.8 Additionally, the majority of economic policies and several housing policies do not set out details regarding the location, scale and nature of development. Therefore, there is some uncertainty against several SA Objectives whether the proposed development would lead to positive or adverse effects overall.

7.2.9 The full assessments, including text narrative to explain the identified impacts against each SA Objective, are set out in **Appendix D**.

7.2.10 Opportunities for enhancement may also be secured through policies in the SLP. Where there are opportunities to improve the sustainability performance of draft policies these have been identified in SA process and fed back to the Council (see **section 7.3**).

Table 7.11: Summary of policy assessments

Policy Ref	SA1 Cultural Heritage	SA2 Landscape	SA3 Biodiversity	SA4 CC Mitigation	SA5 CC Adaptation	SA6 Natural Resources	SA7 Pollution	SA8 Waste	SA9 Transport	SA10 Housing	SA11 Equality	SA12 Health	SA13 Economy	SA14 Education
SDS1	+	+	+	+	+	+	-	-	+	+	0	+	+	0
SDS2	+	+	+	+	0	++	+	0	+	+	+	+	++	+
SDS3	0	0	+	+/-	0	+	0	0	+	+	+	+	+	0
SDS4	++	++	0	+	+	0	+	0	+	0	+	+	0	0
SDS5	+	+	0	+	0	0	0	0	+	0	+	+	+	0
SDS6	+	+	0	0	0	+	0	0	0	0	0	+	0	0
SDS7	0	+	+	+	+	0	+	0	0	0	0	+	+	0
SNE1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
SNE2	0	+	++	+	+	0	+	0	0	0	0	+	0	0
SNE3	0	+	+	+	+	+	+	0	0	0	0	+	0	0
SNE4	+	+	+	0	0	0	0	0	0	0	0	0	+	+
SNE5	+	++	++	0	+	0	+	0	0	0	0	+	0	0
SNE6	+	+	+	0	0	0	+	0	+	+	0	+	+	0
SHE1	++	+	0	0	0	0	0	0	0	0	0	0	0	0
SHE2	++	+	+	0	0	0	0	0	0	0	0	0	+	0
SHE3	+	+	0	0	0	0	0	0	0	0	0	0	0	0
SHE4	+	+	0	0	0	0	0	0	0	0	0	0	0	+
SCC1	+	+	+	++	+	+	+	0	+	0	0	+	0	0
SCC2	0	0	0	+	+	0	+	0	0	0	0	+	0	0
SCC3	0	0	+	+	+	0	+	0	0	0	0	0	0	0
SCC4	0	0	+	0	++	0	+	0	0	0	0	+	0	0
SCC5	0	+	+	0	+	0	+	0	0	0	0	0	0	0
SCC6	0	0	0	+	0	0	+	0	0	0	0	0	0	0
SHW1	0	0	0	+	0	0	+	0	+	0	+	++	0	0
SHW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0
SHW3	0	0	+	+	0	0	++	0	+	0	0	+	+	0
SHW4	0	+	+	+	+	0	+	0	+	0	+	++	0	0
SHW5	0	+	0	0	0	0	0	0	+	0	+	+	0	0
SHW6	0	+	+	0	0	0	0	0	0	0	+	+	0	0
SHO1	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-
SHO2	0	0	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-
SHO3	0	0	0	+	0	0	+	0	+	+	+	+	0	0
SHO4	0	0	0	0	0	0	0	0	0	+	+	0	0	0
SHO5	0	0	0	0	0	0	0	0	0	+	+	+	0	0
SHO6	0	0	0	0	0	0	0	0	0	+	+/-	0	0	0
SHO7	0	0	0	0	0	0	0	0	0	+	+	0	0	0
SHO8	0	0	0	0	0	0	0	0	+	+	+	+	0	0
SHO9	0	0	0	+	0	0	+	0	+	0	+	+	+	++
SHO10	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+

Policy Ref	SA1 Cultural Heritage	SA2 Landscape	SA3 Biodiversity	SA4 CC Mitigation	SA5 CC Adaptation	SA6 Natural Resources	SA7 Pollution	SA8 Waste	SA9 Transport	SA10 Housing	SA11 Equality	SA12 Health	SA13 Economy	SA14 Education
SHO11	0	0	0	0	0	0	0	0	+	0	+	+	0	0
SEC1	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-
SEC2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-
SEC3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-
SEC4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-
SEC5	0	0	0	0	0	0	0	0	+	0	+	+	+	+
SEC6	0	0	0	0	0	0	0	0	0	0	0	0	+	0
SCE1	+/-	+/-	+/-	+	+/-	+	+/-	+/-	+	+	+	+	+	+/-
SCE2	0	+	0	0	0	0	0	0	0	0	0	0	+	0
SCE3	0	0	0	0	0	0	0	0	+	+	+	+	+	+
SCE4	0	0	0	0	0	0	0	0	+	+	+	0	+	0
SCE5	0	0	0	+	0	0	+	0	+	0	+	+	+	0
SCE6	0	0	0	+	0	0	+	0	+	0	+	+	+	0
SWB1	0	+	0	+	+	+	0	0	+	+	+	+	+	+
SWB2	0	+	0	+	0	+	0	0	+	+	+	+	+	+
STR1	0	0	0	+	0	0	+	0	++	0	0	+	0	0
STR2	0	0	0	+	0	0	0	0	+	0	0	0	0	0
STR3	0	0	0	+	0	0	0	0	+	0	0	0	0	0
STR4	0	0	-	0	0	0	0	0	+	0	0	0	+	0
STR5	0	0	0	+	0	0	0	0	++	0	+	+	0	0
STR6	0	0	0	+	0	0	+	0	++	0	0	0	0	0
STR7	0	0	0	0	0	0	0	0	+	0	0	0	0	0
STR8	0	0	0	0	0	0	0	0	+	0	0	0	+	0
STR9	0	0	0	+	0	0	+	0	+	0	0	0	0	0
STR10	0	0	0	+	0	0	+	0	+	0	0	0	+	0
SID1	0	0	0	+	0	0	+	0	+	0	+	0	+	0
SID2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SID3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SWA1	0	0	0	0	0	0	0	++	0	0	0	0	0	0
SWA2	0	0	0	0	0	0	0	+	0	0	0	0	0	0
SWA3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
SWA4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
SWA5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
SMI1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
SMI2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
SCO1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SCO2	0	0	0	0	0	0	+	0	0	0	0	0	0	0
SCO3	0	+	0	0	0	+	0	0	0	0	0	0	0	0
SDM1	0	+	+	+	+	0	+	0	+	0	+	+	0	0
SDM2	0	0	0	0	0	+	0	0	0	0	0	+	0	0
SDM3	0	+	0	+	0	+	0	0	+	0	0	0	0	0

Policy Ref	SA1 Cultural Heritage	SA2 Landscape	SA3 Biodiversity	SA4 CC Mitigation	SA5 CC Adaptation	SA6 Natural Resources	SA7 Pollution	SA8 Waste	SA9 Transport	SA10 Housing	SA11 Equality	SA12 Health	SA13 Economy	SA14 Education
SDM4	0	+	0	0	0	0	0	0	0	0	0	0	0	0
SDM5	+	+	0	0	0	0	0	0	0	0	0	0	+	0
SDM6	0	0	0	0	0	0	0	0	0	0	+	+	0	0
SDM7	0	0	0	0	0	0	0	+	0	0	0	0	+	0
SDM8	0	0	0	0	0	0	0	0	0	0	0	0	+/-	0
SDM9	0	0	0	0	0	0	0	0	0	0	+	+	0	0
SDM10	0	0	0	0	0	0	0	0	0	0	0	0	+	0

Table 7.22: *Summary of SLP Vision and Objectives assessments*

Vision & Objectives	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
SLP Vision	++	++	+	++	++	+	+	+	++	++	++	++	++	++
SLP O 1	0	0	0	++	++	0	0	0	0	0	0	0	0	0
SLP O 2	+	+	0	+	0	0	+	0	++	0	+	++	++	++
SLP O 3	0	++	++	++	++	+	+	0	+	0	+	+	0	0
SLP O 4	++	++	0	0	0	0	0	0	0	0	0	0	+	+
SLP O 5	+	++	+	0	0	0	0	0	0	0	0	0	+	+
SLP O 6	0	0	0	+	+	0	0	0	0	++	+	0	0	0
SLP O 7	0	0	0	0	0	0	0	0	0	0	++	+	0	0
SLP O 8	0	0	0	0	0	0	0	0	0	0	+	0	++	0
SLP O 9	0	0	0	0	0	0	0	0	0	0	+	0	++	+
SLP O 10	0	0	0	+	0	0	+	0	+	0	++	++	0	0
SLP O 11	0	0	0	0	0	0	0	0	0	0	++	++	0	0
SLP O 12	0	+	0	+	0	+	+	0	++	0	++	++	0	0
SLP O 13	+	++	0	0	0	0	0	0	0	0	+	+	0	0
SLP O 14	0	+	0	+	0	++	+	+	0	0	0	0	+	0
SLP O 15	+	+	0	0	0	0	0	0	+	+	+	+	++	+
SLP O 16	0	0	0	+	0	0	+	0	++	0	0	+	0	0
SLP O 17	0	0	0	0	0	0	+	+	0	0	0	0	0	0
SLP O 18	0	0	0	+	0	+	+	+	++	0	+	+	+	+

7.3   Policy recommendations

7.3.1   Recommendations have been made throughout the SA process so far to help improve the SLP policies, including at the previous stage of plan-making (see the Issues and Options SA Report[62]) and in draft iterations of this Regulation 18 (II) SA Report which have been issued to SMBC.

7.3.2   **Table 7.3** lists these recommendations made to date and indicates which have been acted upon by SMBC within the Draft SLP. It should be noted that the recommendations are not exhaustive, nor are they all essential.

7.3.3   More general recommendations for the SLP have also been made at this stage (see **Table 9.1**).   Further recommendations will be provided where appropriate throughout the consecutive stages of the SLP.

Table 7.33: Policy Recommendations for the SLP

Policy	Recommendations	Action taken in Draft SLP
SLP Vision and Objectives	• The SLP Vision and Objectives could be enhanced through incorporating stronger reference to the importance of conservation and enhancement of cultural heritage and the historic environment, such as seeking opportunities for heritage-led regeneration. • The SLP Vision and Objectives could be strengthened through including wording to promote nature recovery and delivering measurable net gains in biodiversity alongside residential and economic growth. • The SLP Vision would benefit from stronger reference to the importance of active travel networks in encouraging healthy lifestyles and addressing climate change and air quality impacts associated with road transport. • The SLP Vision does not directly reference waste or recycling, although waste management is referred to within SLP Objective 10. Wording could be incorporated to recognise the role that the SLP can play in helping to minimise waste generation and promoting the recycling or re-use of materials during construction and occupation of development. • Although the conservation of natural environments and importance of GI are highlighted through the SLP Vision and Objectives, it is suggested that wording could be included to recognise the importance of conserving and improving air and water quality for both human and ecosystem health.	The Vision and Objectives as presented within the Draft SLP have been updated in light of the SA recommendations at the Issues and Options stage, and have been re-assessed in **Appendix D**.

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[62] Lepus Consulting (2023) Sustainability 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: 18/10/23]

Policy	Recommendations	Action taken in Draft SLP
	Air pollution in particular is a key issue for Sandwell.	
Policy SDS2 – Regeneration in Sandwell	• It is recommended that the policy provides further specification of the GI measures to strengthen the policy.	The policy recommendation has been actioned within the policy wording including cross-reference to SDS7.
Policy SDS4 – Achieving Well-designed Places	• Policy would benefit from stronger wording surrounding the historic environment and heritage assets, to ensure that the setting and significance of heritage assets is conserved and enhanced.	The policy recommendation has been actioned within the policy wording.
Policy SDS5 – Cultural Facilities and the Visitor Economy	• Policy would benefit from stronger wording surrounding heritage assets and how their settings and significance should be conserved and enhanced alongside any proposed "*heritage-related tourism*" schemes.	The policy recommendation has been actioned within the policy wording.
Policy SHO4 – Affordable Housing	• The policy wording could be strengthened to ensure that all new developments contribute towards the provision of affordable homes and that the number/proportion will be determined through site-specific considerations including viability evidence. • Policy SHO4 could usefully cross-reference to (or incorporate the wording from) Policy SHO6 to ensure that where providing 25% affordable homes is not possible, the maximum proportion of affordable housing is required that does not undermine the development's viability. • The policy should include wording to ensure that the affordable housing provided will remain affordable in perpetuity.	The policy recommendation has been actioned within the policy wording.
Policy SNE1 – Nature Conservation	• Policy SNE1 should take into account the findings / recommendations of the Habitats Regulations Assessment when available.	N/A (this will apply at the Regulation 19 stage when the full HRA is available)
Policy SCO2 – Pollution Control	• The policy would benefit from stronger wording to seek an improvement in air quality and remediation of other pollutants.	The policy recommendation has not been actioned; the Council could consider adding further details to ensure clarity, although this would be unlikely to significantly affect sustainability performance.
Policy SDM1 – Design Quality	• Stronger wording is recommended surrounding the "historic assets" mentioned, regarding how new development could contribute to conserving and enhancing historic assets and their settings.	The policy recommendation has been actioned within the policy wording.
Policy SDM3 – Tall Buildings and Gateway Sites	• It is recommended that the requirement for LVIA/LVA is made clear within the policy wording rather than the supporting text. - landscape	The policy recommendation has been actioned within the policy wording.
Policy SEC6 – Relationship between Industry and Sensitive Uses	• The policy could be improved through including reference to the types of adverse effect covered to ensure clarity, for example whether this should include visual impacts,	The policy recommendation has been actioned within the policy wording (a footnote has been added).

Policy	Recommendations	Action taken in Draft SLP
	traffic generation, pollution (air, noise, water, soil), disturbance etc.	
Policy SHE1 – Listed Buildings and Conservation Areas	• It is recommended that the word "conserve" rather than "preserve" is used with regard to cultural heritage, reflecting the wording in the NPPF.	The policy recommendation has been actioned within the policy wording.
Policy SHE1 and SHE2 – Development in the Historic Environment	• The Council could consider the potential to merge Policy SHE1 and SHE2 into a single policy to provide a clear position across all designated heritage assets and to avoid repetition.	The policy recommendation has not been actioned. Although, this would have little bearing on sustainability performance.
Policy SID2 – Mobile Network Infrastructure	• The policy would benefit from stronger wording on the requirements for the location of infrastructure and measures that would ensure that the potential for adverse effects on landscape, biodiversity and heritage assets are considered and avoided/mitigated accordingly.	The policy recommendation has been actioned within the policy wording.
Policy SNE3 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows	• It is recommended that this policy is expanded to ensure that the species of trees planted and their location within the development is informed by a site-specific survey carried out by a qualified ecologist/arboriculturist.	The policy recommendation has been actioned within the policy wording.
Policy SWA4 – Locational Considerations for New Waste Facilities	• Policy SWA4 states "*proposals must accord with all other policies in relation to the protection of the environment and public amenity*". However, it is uncertain what policies this is referring to. It is recommended that this statement is expanded, and further detail provided.	The policy recommendation has not been actioned; the Council could consider adding further details to ensure clarity, although this would be unlikely to significantly affect sustainability performance.