

9 Recommendations

9.1 Recommendations for the Sandwell Local Plan

- 9.1.1 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 Regulation 18 (I) Issues and Options SA Report⁶⁵) and in draft iterations of this Regulation 18 (II) SA Report which have been issued to SMBC.
- 9.1.2 A range of recommendations have been made for SMBC to consider as the SLP progresses, including recommendations for specific policies that are presented in **Table 7.3**, as well as more general recommendations for the SLP in **Table 9.1** below.
- 9.1.3 These recommendations should be read in conjunction with those set out in the Table 4.1 of the Issues and Options SA Report⁶⁶.
- 9.1.4 The recommendations within **Table 9.1** are not exhaustive. Further recommendations will be provided where appropriate throughout the consecutive stages of the SLP.

Table 9.11: SA recommendations for the emerging Sandwell Local Plan

SA Objective	SA Recommendations
1: Cultural Heritage	<ul style="list-style-type: none"> Where a development proposal could potentially result in substantial harm to the significance of a historic asset, clear justification should be provided, for example public benefits outweighing the harm to the asset. This will be particularly applicable if SMBC intend to prepare any site policies to accompany specific allocations at the Regulation 19 stage.
2: Landscape	<ul style="list-style-type: none"> Ensure development proposals are in-keeping with the local landscape character and the findings of the most recent Landscape Sensitivity Assessment⁶⁷, or any subsequent evidence prepared. Ensure development proposals are constructed in accordance with appropriate design guides and codes, including the 'Design: process and tools'⁶⁸ government guidance.

⁶⁵ 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]

⁶⁶ 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]

⁶⁷ Land Use Consultants (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: 18/10/23]

⁶⁸ MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date accessed: 18/10/23]

SA Objective	SA Recommendations
	<ul style="list-style-type: none"> Support development proposals which are in accordance with the findings of the Green Belt Study⁶⁹, where relevant.
<p>3: Biodiversity, flora, fauna and geodiversity</p>	<ul style="list-style-type: none"> Policies should support development which aims to protect, and where possible provide, supporting habitat to nearby Habitats sites. SMBC could consider implementing an Environmental Net Gain policy which would require developers to deliver a wider range of environmental benefits than BNG alone, such as for air quality and flood risk management^{70 71}, which would better reflect the 25-year Environment Plan⁷². Protect and enhance the local green and blue infrastructure networks through a specific GI policy. It is recommended that a Green Infrastructure Plan or Strategy is prepared. Improve resilience and connectivity of biodiversity sites through landscape scale management. Ensure development proposals consider the potential to deliver wider benefits to natural capital and ecosystem services at every opportunity.
<p>4: Climate change mitigation</p>	<ul style="list-style-type: none"> Provide necessary infrastructure to encourage low carbon options and carbon neutral development where possible. Aim to protect and enhance public space to encourage safe walking and cycling opportunities. All development proposals should aim to exceed the standards set out in the Building Regulations⁷³. Seek to achieve no biodegradable waste to landfill to reduce emissions, in line with 'Net Zero the UK's contribution to stopping global warming'⁷⁴. Consider retrofitting buildings to make them more energy efficient. It is recommended that further climate change evidence is gathered; this could also help to identify the carbon capture and storage potential of the Plan area. Consider local partnerships to establish locally appropriate solutions to the climate crisis. Where policies mention GI measures, ensure they are detailed and specific to strengthen individual policies.

⁶⁹ Land Use Consultants (2019) Black Country Green Belt Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf [Date accessed: 18/10/23]

⁷⁰ DEFRA (2019) Natural Capital Committee advice to government on net environmental gain. Available at: <https://www.gov.uk/government/publications/natural-capital-committee-advice-to-government-on-net-environmental-gain> [Date accessed: 18/10/23]

⁷¹ National Infrastructure Commission (2021) Natural Capital and Environmental Net Gain: A discussion paper. Available at: <https://nic.org.uk/studies-reports/natural-capital-environmental-net-gain/#:~:text=Environmental%20net%20gain%20is%20the,to%20the%20pre%2Ddevelopment%20baseline.&text=Biodiversity%20net%20gain%20is%20a,for%20achieving%20environmental%20net%20gain> [Date accessed: 18/10/23]

⁷² HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [Date accessed: 20/10/23]

⁷³ MHCLG (2021) Building Regulations: Approved Document. Available at: <https://www.gov.uk/government/collections/approved-documents> [Date accessed: 18/10/23]

⁷⁴ Committee on Climate Change (2019) Net Zero The UK's contribution to stopping global warming. Available at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> [Date accessed: 18/10/23]

SA Objective	SA Recommendations
5: Climate change adaptation	<ul style="list-style-type: none"> Using relevant data sources, ensure development proposals incorporate green infrastructure where appropriate. Ensure development proposals do not result in the exacerbation of surface water flood risk in surrounding areas. Development proposals should be built in accordance with the relevant Surface Water Management Plan⁷⁵. It is recommended that the Black County Surface Water Management Plan is updated. Ensure capacity of water treatment works is sufficient to support the planned growth through early consultation with relevant water companies.
6: Natural resources	<ul style="list-style-type: none"> The retention of trees and other vegetation should be encouraged to help retain the stability of the soil and prevent erosion. Effective management should be in place to help prevent pollution and unnecessary compaction of soils during construction. Consider the requirement for Construction Environmental Management Plans in Planning Conditions. Where sites contain bare soil following construction of development, it is recommended that vegetation, in particular native plant species, be used to cover the ground. Where possible, provide green infrastructure or open space to protect areas of BMV soil within a site boundary. Encourage the reuse of contaminated land for new development, where it can be demonstrated that the contamination can be effectively managed or remediated so that it is appropriate for the proposed use.
7: Pollution	<ul style="list-style-type: none"> Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality or for air quality monitoring. Development should take into consideration recommendations within the relevant Air Quality Action Plan and the outputs of the Annual Status Reports. Ensure visual and auditory buffers are incorporated at the edge of development proposals located in close proximity to railway lines to help mitigate noise pollution. Ensure development proposals which could potentially result in an increase in noise disturbance are adequately mitigated, for example, through efficient layout of development, restrict activities at certain times or the use of noise insulation. Development proposals should aim to protect areas identified as tranquil. An example method for identifying tranquillity include 'Mapping Tranquillity'⁷⁶. Development proposals should be built in accordance with recommendations within the Water Cycle Study⁷⁷ and other relevant documents within the Evidence Base, including Water Resource Management Plans, Catchment Flood Management Plan and Basin Management Plans. It is recommended that the Water Cycle Study is updated.
8: Waste	<ul style="list-style-type: none"> Development proposals should demonstrate measures to minimise waste generation during construction.

⁷⁵ Scott Wilson (2009) Black Country Water Cycle Study and Scoping Surface Water Management Plan. Available at: https://blackcountryplan.dudley.gov.uk/media/11668/water_cycle_study_scoping_surface_water_mgmnt_plan.pdf [Date accessed: 18/10/23]

⁷⁶ CPRE (2005) Mapping Tranquillity. Available at: <https://www.cpre.org.uk/resources/mapping-tranquillity/> [Date accessed: 18/10/23]

⁷⁷ Scott Wilson (2009) Black Country Water Cycle Study and Scoping Surface Water Management Plan. Available at: https://blackcountryplan.dudley.gov.uk/media/11668/water_cycle_study_scoping_surface_water_mgmnt_plan.pdf [Date accessed: 18/10/23]

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	<ul style="list-style-type: none"> Development proposals should integrate well-designated waste storage space to facilitate effective waste storage, recycling and composting.
9: Transport and accessibility	<ul style="list-style-type: none"> Ensure all development proposals and Travel Plans (where applicable) aim to reduce the reliance on the private car where-ever possible and aim to promote access to local facilities and services in a manner which minimises climate change emissions and promotes active travel.
10: Housing	<ul style="list-style-type: none"> Ensure all development proposals are built to a high-quality design in line with the 'Design: process and tools'⁷⁸ government guidance.
11: Equality	<ul style="list-style-type: none"> Ensure residential development proposals incorporate functional private or communal open space, including green space. Ensure development proposals provide adequate indoor space in line with, or beyond, the requirements set out in the technical housing standards⁷⁹. Where appropriate, consider the option for community ownership of some facilities and services. Ensure development proposals promote social interaction, including the establishment of strong neighbourhood centres. Ensure development proposals take into account privacy, access to sunlight, noise and disturbance, vibration, artificial lighting, odor, crime and safety. Ensure development proposals promote safe and accessible neighbourhoods, helping to reduce crime and the fear of crime.
12: Health	<ul style="list-style-type: none"> Development proposals should take into consideration the findings of the relevant Playing Pitch or Sports Strategies, along with other relevant documents within the evidence base. Improve or enhance the PRow and cycle network across the Plan area. It is recommended that the Rights of Way Improvement Plan is updated. Provide or improve safe pedestrian and cycle access to public greenspaces and open spaces. Development proposals should be in accordance with the relevant Open or Green Space Strategy. Ensure development proposals do not result in detrimental impacts to the safety of pedestrians and cyclists.
13: Economy	<ul style="list-style-type: none"> Ensure residential-led proposals are located in close proximity to bus stops or other sustainable transport options to reach employment opportunities, informed by the latest available accessibility information. Improve access to employment opportunities, through provision of bus stops and bus services, and/or improvements to the local pedestrian and cycle networks. Infrastructure policies should be strongly worded to ensure potential for adverse effects on landscape, biodiversity and heritage assets are considered and avoided/mitigated accordingly.
14: Education	<ul style="list-style-type: none"> Increase the provision and capacity of primary and secondary schools across the Plan area in line with the identified need.

⁷⁸ MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date accessed: 18/10/23]

⁷⁹ MHCLG (2015) Technical housing standards – nationally described space standards. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf [Date accessed: 18/10/23]