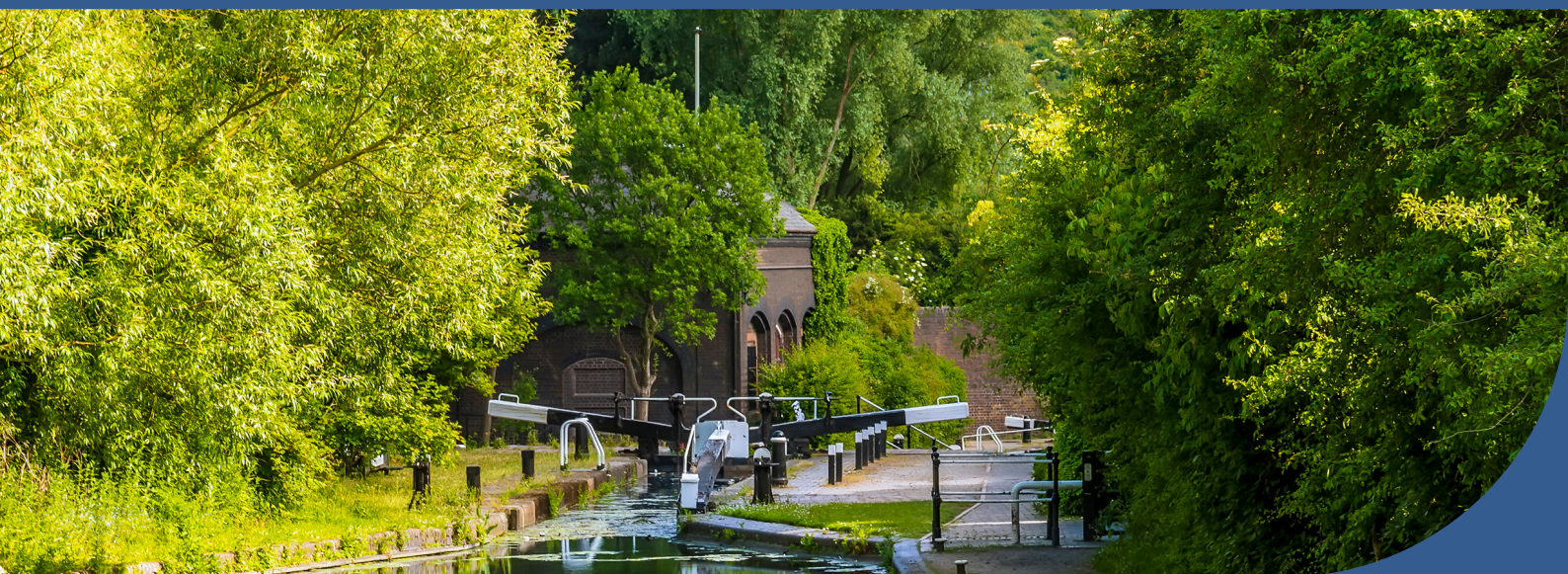


# Sustainability Appraisal of the Dudley Local Plan

## Volume 1 of 2: Regulation 18 Draft Plan SA

October 2023



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

# Sustainability Appraisal of the Dudley Local Plan

Volume 1 of 2: Regulation 18 Draft Plan SA

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# About this report & notes for readers

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This report has been produced to evaluate the potential sustainability impacts of the Dudley Local

Plan and meets the requirements of the SEA Regulations. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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# Contents

Executive Summary.....	vi
<b>1 Introduction .....</b>	<b>1</b>
1.1 Background .....	1
1.2 Dudley Metropolitan Borough Council.....	1
1.3 The Dudley Local Plan .....	4
1.4 Duty to Cooperate.....	4
1.5 Integrated approach to SA and SEA.....	5
1.6 Best Practice Guidance .....	5
1.7 Sustainability Appraisal .....	6
1.8 The SA process so far.....	8
1.9 Scoping Report .....	8
1.10 Signposting for this report .....	12
<b>2 Assessment methodology and scope of appraisal .....</b>	<b>14</b>
2.1 Assessment of reasonable alternatives.....	14
2.2 Impact assessment and determination of significance .....	16
2.3 Sensitivity.....	16
2.4 Magnitude .....	17
2.5 Significant effects.....	17
2.6 Limitations of predicting effects.....	19
2.7 Methodology for assessment of spatial growth options and policies .....	20
<b>3 Assessment of Housing Spatial Growth Options .....</b>	<b>21</b>
3.1 Preface .....	21
3.2 Assessment .....	22
3.3 Conclusions .....	31
3.4 Selection and Rejection .....	31
<b>4 Assessment of Employment Spatial Growth Options.....</b>	<b>32</b>
4.1 Preface .....	32
4.2 Assessment .....	33
4.3 Conclusions .....	38
4.4 Selection and Rejection .....	38
<b>5 Assessment of Gypsy and Traveller Spatial Growth Options .....</b>	<b>39</b>
5.1 Preface .....	39
5.2 Assessment .....	40
5.3 Conclusions .....	46
5.4 Selection and Rejection .....	47
<b>6 Assessment of policies .....</b>	<b>48</b>
6.1 Preface .....	48
6.2 Overview of Policy Assessments .....	49
<b>7 Assessment of reasonable alternative development sites .....</b>	<b>54</b>
7.1 Preface .....	54
7.2 Overview of Site Assessments (Pre-Mitigation).....	54
7.3 Mitigation .....	62
7.4 Selection and Rejection of Sites.....	77
<b>8 Recommendations .....</b>	<b>93</b>
8.1 Overview.....	93
<b>9 Conclusions and next steps .....</b>	<b>98</b>

9.1	Consultation on the Regulation 18 SA Report.....	98
9.2	Responding to the consultation .....	98

## Appendices (see Volume 2)

Appendix A	SA Framework for the DLP
Appendix B	Site assessment methodology and assumptions
Appendix C	Assessment of reasonable alternative sites
Appendix D	Assessment of DLP Part 1 policies (Spatial Strategy and Policies)
Appendix E	Assessment of DLP Part 2 policies (Allocations and Centres)

## Tables

<b>Table 1.1:</b>	The DLP and Sustainability process so far .....	8
<b>Table 1.2:</b>	Consultation responses from statutory consultees on SA Scoping Report (May 2023) .....	9
<b>Table 2.1:</b>	Summary of SA Objectives .....	14
<b>Table 2.2:</b>	Impact sensitivity .....	17
<b>Table 2.3:</b>	Impact magnitude.....	17
<b>Table 2.4:</b>	Guide to scoring significant effects .....	18
<b>Table 2.5:</b>	Presenting likely impacts .....	20
<b>Table 3.1:</b>	Dudley housing spatial growth options identified by DMBC .....	21
<b>Table 3.2:</b>	Impact matrix of the three housing spatial growth options .....	22
<b>Table 4.1:</b>	Dudley employment land spatial growth options identified by DMBC.....	32
<b>Table 4.2:</b>	Impact matrix of the two employment land spatial growth options .....	33
<b>Table 5.1:</b>	Dudley Gypsy and Traveller spatial growth options identified by DMBC .....	40
<b>Table 5.2:</b>	Impact matrix of the three Gypsy and Traveller spatial growth options .....	40
<b>Table 6.1:</b>	Summary of policy assessments .....	50
<b>Table 7.1:</b>	Summary impact matrix of all reasonable alternative sites .....	55
<b>Table 7.2:</b>	Mitigating DLP Policy for SA Objective 1 – Cultural Heritage.....	62
<b>Table 7.3:</b>	Mitigating DLP Policy for SA Objective 2 - Landscape .....	63
<b>Table 7.4:</b>	Mitigating DLP Policy for SA Objective 3 – Biodiversity.....	64
<b>Table 7.5:</b>	Mitigating DLP Policy for SA Objective 4 – Climate Change mitigation .....	67
<b>Table 7.6:</b>	Mitigating DLP Policy for SA Objective 5 – Climate Change adaptation .....	67
<b>Table 7.7:</b>	Mitigating DLP Policy for SA Objective 6 – Natural Resources.....	68
<b>Table 7.8:</b>	Mitigating DLP Policy for SA Objective 7 – Pollution.....	69
<b>Table 7.9:</b>	Mitigating DLP Policy for SA Objective 8 – Waste .....	71
<b>Table 7.10:</b>	Mitigating DLP Policy for SA Objective 9 – Transport and Accessibility .....	71
<b>Table 7.11:</b>	Mitigating DLP Policy for SA Objective 11 – Equality.....	74
<b>Table 7.12:</b>	Mitigating DLP Policy for SA Objective 12 - Health .....	74
<b>Table 7.13:</b>	Mitigating DLP Policy for SA Objective 13 – Economy .....	75
<b>Table 7.14:</b>	Mitigating DLP Policy for SA Objective 14 – Education, skills and training .....	76
<b>Table 7.15:</b>	Outline reasons for selection and rejection of reasonable alternative sites: Housing .....	79
<b>Table 7.16:</b>	Outline reasons for selection and rejection of reasonable alternative sites: Mixed-Use.....	88
<b>Table 7.17:</b>	Outline reasons for selection and rejection of reasonable alternative sites: Employment.....	90
<b>Table 7.18:</b>	Outline reasons for selection and rejection of reasonable alternative sites: Gypsy and Traveller ....	91

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<b>Table 8.1:</b> SA Recommendations for the proposed Dudley Local Plan policies.....	93
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## Boxes

<b>Box 2.2:</b> Schedule 1 of the SEA Regulations.....	16
<b>Box 6.1:</b> Scoring system for policy assessments.....	48

## Figures

<b>Figure 1.1:</b> Dudley Metropolitan Borough Council administrative boundary .....	3
<b>Figure 1.2:</b> Sustainability appraisal process.....	7

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# Acronyms & Abbreviations

A&E	Accident and Emergency
AAP	Area Action Plan
AHHLV	Area of High Historic Landscape Value
AHHTV	Area of High Historic Townscape Value
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
APA	Archaeological Priority Area
AQMA	Air Quality Management Area
BCCS	Black Country Core Strategy
BCP	Black Country Plan
BMV	Best and most versatile
BNG	Biodiversity net gain
CA	Conservation Area
CfS	Call for Sites
DEFRA	Department for Environment, Food and Rural Affairs
DLHHV	Designed Landscape of High Historic Value
<b>DLP</b>	Dudley Local Plan
DLUHC	Department for Levelling Up, Housing and Communities
<b>DMBC</b>	Dudley Metropolitan Borough Council
DtC	Duty to Cooperate
EDNA	Economic Development Needs Assessment
EU	European Union
FEMA	Functional Economic Market Area
GHG	Greenhouse Gas
GI	Green Infrastructure
GIS	Geographical Information Systems
GP	General Practitioner
GTAA	Gypsy and Traveller Accommodation Assessment
GTTS	Gypsy, Traveller and Travelling Showpeople
HEADs	Historic Environment Area Designations
HIA	Health Impact Assessment
HLC	Historic Landscape Characterisation
HRA	Habitats Regulations Assessment
IMD	Index of Multiple Deprivation
IRZ	Impact Risk Zone
LNR	Local Nature Reserve
LSOA	Lower Super Output Area
LVA	Landscape and Visual Appraisal
L VIA	Landscape and Visual Impact Assessment
MHCLG	Ministry of Housing, Communities and Local Government
MHCLG	Ministry of Housing, Communities and Local Government
MSA	Mineral Safeguarding Area
NHS	National Health Service
NNR	National Nature Reserve

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NO <sub>2</sub>	Nitrogen Dioxide
NPPF	National Planning Policy Framework
ONS	Office of National Statistics
PM <sub>10</sub>	Particulate Matter (10 micrometres)
PPP	Policies Plans and Programmes
PRoW	Public Rights of Way
RPG	Registered Park and Garden
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SINC	Site of Importance for Nature Conservation
SLINC	Site of Local Importance for Nature Conservation
SM	Scheduled Monument
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System
SWFR	Surface Water Flood Risk
ZOI	Zone of Influence



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# Executive Summary

## About this report

- E1 Lepus Consulting is conducting an appraisal process for Dudley Metropolitan Borough Council (DMBC) to help them prepare the Dudley Local Plan (DLP). The appraisal process is known as Sustainability Appraisal (SA) and is prepared during a number of different stages to facilitate iteration between the Plan makers (DMBC) and the appraisal team (Lepus Consulting). The process seeks to provide high level environmental protection and the different stages of plan making are mostly accompanied by consultation with statutory bodies, other stakeholders and the public.
- E2 SA is the process of informing and influencing the preparation of a Development Plan to optimise its sustainability performance. SA considers the social, economic and environmental performance of the Local Plan.
- E3 This report is being published as the second output in the SA process following consultation with the statutory consultees on the SA Scoping Report, prepared in May 2023, which identified the scope and level of detail to be included in the SA process going forward.
- E4 This Regulation 18 SA Report has been prepared to assess the options (or 'reasonable alternatives') as identified by the Council during the preparation of the Draft Dudley Local Plan. This includes options for housing growth, employment growth, Gypsy and Traveller growth, and development sites. The SA also includes an assessment of the draft policies as presented within the Draft DLP Regulation 18 consultation document.

## Summary findings

- E5 Findings from the assessments are presented in a single-line matrix format. The high-level matrix is not a conclusive tool or model. Its main function is to identify at a strategic level whether or not the assessment requires a more detailed examination or whether satisfactory conclusions may be drawn from the high-level assessment without the need for further (time consuming) detailed analysis of a particular policy.
- E6 As required by the SEA Regulations, cumulative, indirect and synergistic effects are also identified and evaluated during the assessment, where relevant.

## *Housing Spatial Growth Options*

- E7 Based on the most up to date national standard method housing calculation, the identified housing need to 2041 for Dudley is 11,954 homes.
- E8 DMBC have identified three spatial options for housing growth within Dudley:
- **Housing Spatial Growth Option 1** - Meeting the majority of our needs in the urban area alone and maintaining the existing 'brownfield first' strategy;
  - **Housing Spatial Growth Option 2** – Meeting the majority of our housing need through urban uplift in regeneration corridors and centres plus some development proposed on smaller areas of low-quality open space; and

- **Housing Spatial Growth Option 3 (DMBC's preferred option)** – Meeting all or the majority of our housing need through urban uplift in regeneration corridors and centres, some development proposed on smaller areas of low-quality open space, plus DtC contributions.

- E9 When assessing the housing spatial options against the 14 SA Objectives, there is very little separating Options 1, 2 and 3 and it is difficult to identify a single best performing option. All would be expected to deliver a similar level of growth within Dudley.
- E10 All options would be likely to perform positively in terms of access to transport infrastructure, healthcare, employment opportunities and education (SA Objectives 9, 12, 13 and 14). Although, Options 2 and 3 would be likely to perform better than Option 1 in these areas due to their requirement to demonstrate that accessibility standards are met.
- E11 Conversely, Option 1 could potentially perform better than Options 2 and 3 in terms of natural resources (SA Objective 6) due to the reduced scope for development on previously undeveloped land.
- E12 The potential for adverse effects on several of the SA Objectives, such as on biodiversity, climate change mitigation/adaptation, pollution and waste (SA Objectives 3, 4, 5, 7 and 8) will depend upon the scale, nature and design of the development at the site level.
- E13 Overall, Option 3 appears to be the most favourable housing spatial growth option as it ensures the housing need will be met, although there is also some uncertainty in the impacts of this option given the unknown location of the exported proportion of growth.

### ***Employment Spatial Growth Options***

- E14 Dudley is located within the Black Country Functional Economic Market Area (FEMA) which also covers the local authorities of Sandwell, Walsall and Wolverhampton. The Black Country Economic Development Needs Assessment (EDNA) update (September 2023) identifies a demand for 516ha of employment land between 2020 to 2041 across the FEMA as a whole, including 72ha for Dudley MBC. The current employment land supply to 2041 in Dudley is 25ha, leaving a shortfall of 47ha.
- E15 Two spatial options for employment growth have been identified by DMBC which include distributions of employment land across the borough and exported through DtC.
- **Employment Spatial Growth Option 1** - Meeting the majority of our employment land needs in the urban area alone and maintaining the existing 'brownfield first' strategy.
  - **Employment Spatial Growth Option 2 (DMBC's preferred option)** - Meeting all or the majority of our employment land needs in the urban area alone and maintaining the existing 'brownfield first' strategy, plus DtC contributions.
- E16 It is difficult to determine an overall best performing employment spatial growth option as both options are similar, other than the fact Option 2 includes DtC contributions.

- E17 Option 1 could be seen as more suitable against some SA Objectives, for example biodiversity and landscape (SA Objectives 2 and 3), as it would have fewer uncertainties and gives DMBC full control over the location of employment development.
- E18 Option 2 places reliance on DtC to meet employment needs which could be difficult to achieve and may lead to development in less sustainable locations, with greater uncertainty in the performance against the environmentally focused SA Objectives. However, since Option 2 would be more likely to meet the identified employment land needs, and would ensure this is delivered within the wider FEMA, this option performs better against SA Objective 13 (economy). This would likely lead to more benefits in terms of equal access to employment opportunities as well as education, skills and training (SA Objectives 11 and 14).
- E19 As such, Option 2 would appear to be the better option overall as it would meet employment needs and deliver more social benefits, whereas the potential for adverse effects against environmentally focused SA Objectives are similar to Option 1.

### ***Gypsy and Traveller Spatial Growth Options***

- E20 The identified 5-year Gypsy and Traveller accommodation need for Dudley from 2021-41 is 46 pitches (for those who meet the ethnic definition) or 34 pitches (for those who meet the Planning Policy for Travellers 2015 definition). Currently, there are only 14 vacant pitches at existing sites, therefore, a significant extension of existing sites or DtC contribution will be required to meet the identified need.
- E21 DMBC have identified three spatial options for Gypsy and Traveller growth. All three options would rely on windfall sites to meet identified needs and as such there is some uncertainty in terms of whether this could be achieved. All three options also reference existing pitch allocations.
- **G&T Spatial Growth Option 1** – meeting as much of the need as possible in the Urban Area;
  - **G&T Spatial Growth Option 2** – meeting as much of the need as possible in the Urban Area through intensification, and expansion of existing facilities; and
  - **G&T Spatial Growth Option 3 (DMBC’s preferred option)** – meeting all or the majority of needs in the Urban Area, intensification, and expansion of existing facilities, plus DtC.
- E22 Options 1, 2 and 3 perform similarly overall and would be expected to make significant contributions towards meeting the identified need of 46 additional pitches by 2041 but each spatial option differs slightly with regard to the distribution of growth.
- E23 Options 1, 2 and 3 would locate new residents in central areas where there is generally good access to transport infrastructure, healthcare, jobs and schools, leading to positive impacts against SA Objectives 9, 12, 13 and 14.
- E24 On the other hand, all options could also give rise to some potential adverse effects, for example, added threats and pressures to local biodiversity designations and increased

- pressure for development in areas at risk of surface water and fluvial flooding (SA Objectives 3 and 5).
- E25 There is some uncertainty regarding the effects of the proposed development on cultural heritage, landscape, climate change mitigation, natural resources and waste (SA Objectives 1, 2, 4, 6 and 8), owing to uncertainty in the scale and nature of development involved.
- E26 Option 1 does not suggest any site expansion; therefore, it is unlikely that this option will be able to fully meet Dudley's Gypsy and Traveller accommodation needs. Option 2 would make a greater contribution towards meeting the needs of the Gypsy and Traveller communities within Dudley than Option 1, and proposes similar intensification / expansion of sites to Option 3. If carefully managed, with consideration of local constraints adjacent or near to the existing sites, extending existing sites and adding capacity for both Options 2 and 3 could be achieved with minimal negative impacts.
- E27 Option 3 would be the most likely to wholly meet the identified accommodation needs owing to the proposed DtC contributions and performs the best against SA Objectives 10 (housing) and 11 (equality). Without knowing the contribution from DtC partners for site provisions, the full extent of potential impacts are somewhat uncertain. However, overall, Option 3 could be seen as the best performing option because it would be most likely to meet the identified needs and deliver social benefits, whereas the potential for adverse effects against environmentally focused SA Objectives are similar to Option 2.

### *Draft Policies*

- E28 The Draft DLP contains a total of 143 policies, including strategic and non-strategic planning policies and land allocations to support the growth and regeneration of Dudley up to 2041.
- E29 The DLP is presented in two documents: Part 1 contains 89 policies associated with a number of themes. Part 2 contains 54 policies relating to centres of Brierley Hill, Dudley, Stourbridge and Halesowen, including site allocation policies for Opportunity Sites and Priority Sites, and one Local Green Space, for the DLP.
- E30 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 of the policies as presented within the DLP Part 1 (Spatial Strategy and Policies) are set out in full within **Appendix D**. The assessments of the policies as presented within the DLP Part 2 (Allocations and Centres) are set out in full within **Appendix E**. The policy assessments are summarised in **Chapter 6**.
- E31 The proposed DLP policies would be anticipated to help ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the DLP 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.
- E32 For the majority of 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; for example, where the policies incorporate conservation and enhancement of heritage assets (SA Objective 1), measures to mitigate flooding (SA Objective 4) or improve include measures that could potentially improve the surrounding landscape (SA Objective 2), naming a few of those found within the policies.

- E33 A greater range of sustainability effects is identified for policies that have potential to introduce new development, for example, the housing and economy policies, as well as the site allocation policies. As such, uncertain impacts have been identified for some SA Objectives as a result of some of the policies in these sections. The range in potential impacts for these policies owes to the fact that large developments could have major negative impacts when considered without mitigation, however, 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.
- E34 Some policies, such as the development strategy policies, set out the broad direction for growth. As such, minor negative impacts have been identified for certain SA Objectives as a result of some policies in these sections, owing to the potential for the large amount of proposed development to lead to increases in pollution and waste, for example.
- E35 Opportunities for enhancement may also be secured through policies in the DLP. Where there are opportunities to improve the sustainability performance of draft policies, these have been identified in SA process (see **Chapter 8**).

#### *Reasonable Alternative Development Sites*

- E36 A total of 211 reasonable alternative sites have been identified by DMBC. This includes 138 sites proposed for residential use, 21 sites proposed for Gypsy, Traveller and Travelling Showpeople (GTTS) use, 34 sites proposed for employment use and 18 sites proposed for mixed-use (of which four are non-residential mixed uses, and 14 include some residential development).
- E37 The appraisal of the 211 reasonable alternative sites demonstrated that all development proposals would be likely to result in a range of sustainability impacts.
- E38 Dudley is predominantly urban, accompanied with proportions of greenspace dispersed throughout the borough and therefore, the SA identified a range of positive and adverse potential impacts of the reasonable alternative sites on the objectives within the SA framework.
- E39 Negative impacts were mainly related to issues associated with air quality due to the proximity of the new sites to the borough's major roads and the proposed developments impact on the borough's carbon footprint; access to the railway network, coinciding with surface water flood risk (SWFR), sites located in deprived areas, access to NHS Hospitals and potential losses in employment floorspace.
- E40 Positive impacts were identified in relation to the provision of new housing floorspace, benefits to health and accessibility as many sites are located within sustainable distance to public green spaces; accessibility to schools and access to local bus services; and coinciding with Flood Zone 1 where fluvial flood risk is low.

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## Next steps

- E41 This Regulation 18 SA Report will be subject to consultation with statutory consultees, stakeholders and the general public alongside the Regulation 18 version of the Draft DLP and other evidence base documents, between 10<sup>th</sup> November and 22<sup>nd</sup> December 2023.
- E42 This report represents the latest stage of the SA process. The SA process will take on board any comments on this report and use them to inform future SA outputs.
- E43 Once DMBC have reviewed Regulation 18 consultation comments and have begun preparing the next version of the DLP (Regulation 19 stage), preparation of an Environmental Report will begin, also known as a full SA report. The Environmental Report will include all of the legal requirements set out in Schedule 2 of the SEA Regulations.

# 1 Introduction

## 1.1 Background

- 1.1.1 Dudley Metropolitan Borough Council (DMBC) are in the process of writing the Dudley Local Plan (DLP). As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA). The purpose of SA/SEA is to help guide and influence the decision-making process for DMBC by identifying the likely sustainability effects of reasonable alternatives and various options.
- 1.1.2 The purpose of this SA report is to assess the sustainable development implications of proposals presented in the Draft Dudley Local Plan Consultation (Regulation 18) document.
- 1.1.3 A number of reasonable alternatives have been identified by DMBC through the current plan making phase, the evaluation of which has helped to inform the preparation of the Regulation 18 version of the Draft DLP. This includes spatial options for housing, employment and Gypsy and Traveller growth, draft policies and sites. The SA outputs are intended to help DMBC identify sustainable development options and prepare a local plan which is economically, environmentally, and socially sustainable.
- 1.1.4 A sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role 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.
- 1.1.5 This SA/SEA document follows on from the SA Scoping Report prepared in May 2023<sup>1</sup>, which was consulted on with the statutory bodies (Natural England, Historic England and the Environment Agency) between 31<sup>st</sup> May and 5<sup>th</sup> July 2023.

## 1.2 Dudley Metropolitan Borough Council

- 1.2.1 The Dudley administrative area comprises roughly 98km<sup>2</sup>, with a population of approximately 323,581 people according to the Office for National Statistics (ONS) population for mid-2021<sup>2</sup> and is the fifth most densely populated of the West Midlands 30 local authorities. **Figure 1.1** shows the administrative boundary of Dudley, which comprises the plan area for the emerging DLP.

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<sup>1</sup> Lepus Consulting (2023) Sustainability Appraisal of the Dudley Local Plan: Scoping Report, May 2023.

<sup>2</sup> ONS (2021) Estimates of the population for the UK. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland> [Date accessed: 31/05/23]

- 1.2.2 Dudley lies within the Black Country, which is a predominantly urban sub-region of the West Midlands located northwest of Birmingham. The sub-region also includes the boroughs of Sandwell, Walsall and the City of Wolverhampton. The Black Country region is culturally diverse and home to a greater proportion of people from Asian ethnic groups (14.64%) and Black ethnic groups (4.19%) in comparison to National averages (7.5% and 3.3% respectively)<sup>34</sup>.
- 1.2.3 Dudley is highly urbanised, although the borough also contains approximately 1,767ha of Green Belt land forming part of the West Midlands Green Belt which surrounds the West Midlands Conurbation. Dudley Borough is multi-centric, with a strategic centre (Brierley Hill) and the four town centres in the borough are: Dudley, Brierley Hill, Halesowen and Stourbridge. Dudley lies within the Black Country Functional Economic Market Area (FEMA).
- 1.2.4 Dudley is a historically rich, former medieval market town that was one of the birthplaces of the Industrial Revolution becoming an industrial epicentre of the 19<sup>th</sup> Century for iron, coal and limestone industries<sup>5</sup>. A notable historic feature of Dudley is Dudley Castle, an 11<sup>th</sup> Century castle which is a Grade I Listed Building.
- 1.2.5 Dudley is well connected in relation to strategic transport routes, with a number of A and B roads that form the network connecting the borough to the M5 that passes through the borough. The borough is also well connected through railway infrastructure providing links to surrounding areas such as Sandwell and Birmingham. The borough has areas that intersect and lie within the surrounding West Midlands Green Belt.

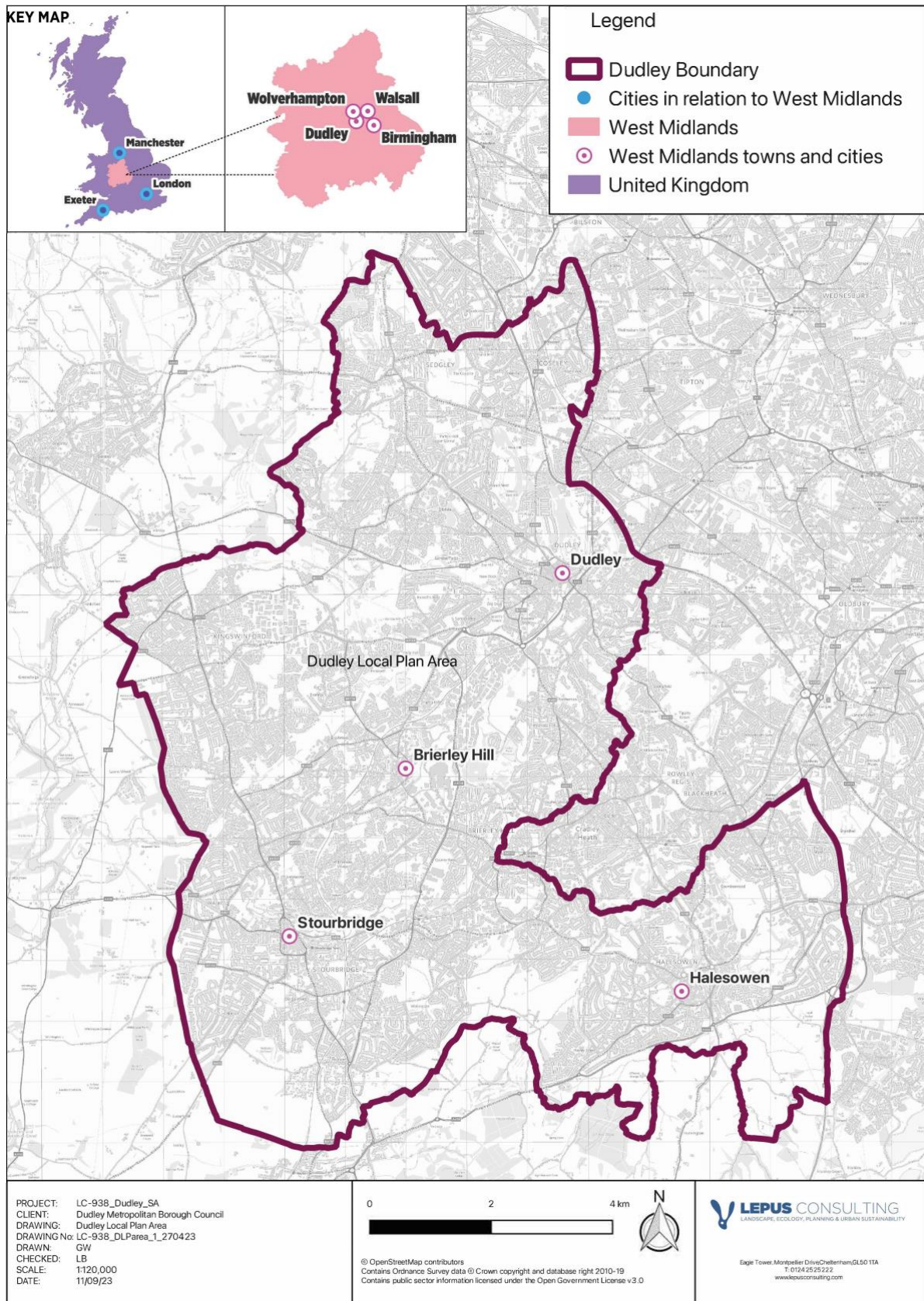
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<sup>3</sup>Office of National Statistics (2018) Population of England and Wales. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/national-and-regional-populations/population-of-england-and-wales/latest> [Date accessed: 31/05/23]

<sup>4</sup> Office of National Statistics (2018) Regional ethnic diversity. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/national-and-regional-populations/regional-ethnic-diversity/latest#download-the-data> [Date accessed: 31/05/23]

<sup>5</sup> Dudley Metropolitan Borough Council (2017). Dudley Area Action Plan. Available at: <https://corporate.tfwm.org.uk/media/3210/wbhe-e28-dudley-area-action-plan-march-2017.pdf> [Date accessed: 31/05/23]





**Figure 1.1:** Dudley Metropolitan Borough Council administrative boundary

## 1.3 The Dudley Local Plan

- 1.3.1 The DLP will provide a vision, objectives, planning policies and proposals for Dudley Metropolitan Borough, to address needs and opportunities in relation to housing and the economy, whilst ensuring there are sufficient community facilities and infrastructure to support the growing population. The DLP will assist with decision-making regarding planning applications and will set out policies for the local area aiming to safeguard the environment, mitigate and adapt to climate change, and achieve well-designed neighbourhoods.
- 1.3.2 The DLP is being prepared by DMBC, following the ending of work on the Black Country Plan (BCP) in autumn 2022<sup>6</sup>. The DLP will also review and incorporate policies and sites adapted from some of those included in the draft BCP, where appropriate, to ensure that the DLP provides appropriate guidance at both the strategic and locally specific levels and builds on the existing body of evidence for the area.
- 1.3.3 The BCP itself began as a review of the adopted Black Country Core Strategy (BCCS), produced by the four Black Country Authorities of Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and City of Wolverhampton Council.
- 1.3.4 Once adopted, the DLP will form part of the statutory development plan for the borough covering the period to 2041, replacing and updating the currently adopted BCCS<sup>7</sup> including the Dudley Borough Development Strategy (DBDS) (2017) and the four current Area Action Plans (AAPs) for Dudley, Brierley Hill, Stourbridge and Halesowen.
- 1.3.5 The DLP will form one complete plan for Dudley Borough, providing certainty and transparency to residents, businesses and developers about how Dudley is expected to grow up to 2041.

## 1.4 Duty to Cooperate

- 1.4.1 The Duty to Cooperate (DtC) was created in the Localism Act 2011<sup>8</sup> and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.
- 1.4.2 A DtC Statement will be prepared, which will demonstrate how DMC has fulfilled this duty through the plan-making process. It is intended to draft and agree Statements of Common Ground with relevant authorities and bodies on key DtC issues at the Publication stage.

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<sup>6</sup> The Black Country Plan 2039. Available at: <https://blackcountryplan.dudley.gov.uk/bcp/> [Date accessed: 31/05/23]

<sup>7</sup> Black Country Authorities (2011) Black Country Core Strategy. Available at: <https://blackcountryplan.dudley.gov.uk/t1/p2/> [Date accessed: 31/05/23]

<sup>8</sup> Localism Act 2011. Available at: <https://www.legislation.gov.uk/ukpga/2011/20/contents> [Date accessed: 09/08/23]

## 1.5 Integrated approach to SA and SEA

- 1.5.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 1.5.2 The European Union Directive 2001/42/EC<sup>9</sup> (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *"the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development"*.
- 1.5.3 The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004<sup>10</sup> (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the Local Plan to be subject to SEA throughout its preparation.
- 1.5.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004<sup>11</sup> 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<sup>12</sup>. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.
- 1.5.5 Public consultation is an important aspect of the integrated SA/SEA process.

## 1.6 Best Practice Guidance

- 1.6.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Regulations. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

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<sup>9</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date accessed: 17/08/23]

<sup>10</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date accessed: 17/08/23]

<sup>11</sup> Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 17/08/23]

<sup>12</sup> The Town and Country Planning Regulations 2012. Available at: <http://www.legislation.gov.uk/ukxi/2012/767/contents/made> [Date accessed: 17/08/23]

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment<sup>13</sup>.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive<sup>14</sup>.
- Department for Levelling Up, Housing and Communities (2023) National Planning Policy Framework (NPPF)<sup>15</sup>.
- Ministry of Housing, Communities and Local Government (2021) Planning Practice Guidance (PPG)<sup>16</sup>.
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans<sup>17</sup>.

## 1.7 Sustainability Appraisal

1.7.1 This document is a component of the SA of the DLP. It provides an assessment of the likely effects of reasonable alternatives, as per Stage B of **Figure 1.2**, according to PPG on SA<sup>18</sup>.

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<sup>13</sup> European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at:  
[http://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf) [Date accessed: 17/08/23]

<sup>14</sup> Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguides\\_ea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguides_ea.pdf) [Date accessed: 17/08/23]

<sup>15</sup> DLUHC (2023) National Planning Policy Framework. Available at:  
<https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 14/09/23]

<sup>16</sup> DLUHC & MHCLG (2021) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 17/08/23]

<sup>17</sup> Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 17/08/23]

<sup>18</sup> DLUHC & MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at:  
<https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 17/08/23]



*Figure 1.2: Sustainability appraisal process*

## 1.8 The SA process so far

1.8.1 **Table 1.1** below presents a timeline of stages of the DLP and SA process so far. To date, this represents Stages A and B of **Figure 1.2**.

**Table 1.1:** *The DLP and Sustainability process so far*

Date	DLP Stage	Sustainability Appraisal
<b>May – July 2023</b>	Plan making commences.	SA Scoping Report The SA Scoping Report identified the scope and level of detail to be included in the SA.
<b>November – December 2023</b>	<b>Draft Dudley Local Plan (Regulation 18) Consultation</b> The Draft Dudley Local Plan document sets out a vision, objectives and a spatial strategy supported by a range of policies for managing development and infrastructure to meet social, environmental and economic needs, and sets out preferred allocations for development.	<b>Regulation 18 SA Report</b> This SA Report assesses the DLP options for housing, employment and Gypsy and Traveller growth as well as reasonable alternative development sites and draft policies.

## 1.9 Scoping Report

1.9.1 In order to identify the scope and level of detail of the information to be included in the SA process, an SA Scoping Report<sup>19</sup> was produced in May 2023.

1.9.2 The SA scoping report represented Stage A of the SA process (see **Figure 1.2**), and presents information in relation to:

- Identifying other relevant plans, programmes and environmental protection objectives;
- Collecting baseline information;
- Identifying sustainability problems and key issues;
- Preparing the SA Framework; and
- Consultation arrangements on the scope of SA with the consultation bodies.

1.9.3 This Regulation 18 SA Report does not replicate baseline and contextual information set out in the SA Scoping Report.

1.9.4 The Scoping report was consulted on between 31<sup>st</sup> May and 5<sup>th</sup> July 2023 with the statutory bodies Natural England, Historic England and the Environment Agency. Comments received during the consultation have informed the preparation of this Regulation 18 SA Report. Table 1.2 summarises the responses received and how these comments have been incorporated into the SA process going forward.

<sup>19</sup> Lepus Consulting (2023) Sustainability Appraisal of the Dudley Local Plan: Scoping Report, May 2023.

**Table 1.2:** Consultation responses from statutory consultees on SA Scoping Report (May 2023)

Consultee	Summary of Consultation Response	Incorporation into the SA
Natural England	No comments received.	N/A
Historic England	<ul style="list-style-type: none"> <li>• Paragraph 6.1.2 policy and guidance also seeks to protect non designated assets as well as non designated archaeology that has the potential to be of national importance.</li> <li>• Paragraph 6.2.6 whilst we accept that specific proposals and design schemes will assist on understanding the specific impacts; during the Local Plan preparation stage we would still expect to see proportionate assessment in understanding what the impacts are for the significance of heritage assets, including their setting and whether proposed site allocations are appropriate in principle.</li> <li>• Paragraph 6.2.7 we would expect to see Heritage Impact Assessment (HIA) for any proposed site allocations within the Dudley Local Plan that assesses whether the principle of development is acceptable and suggests appropriate mitigation and enhancement opportunities.</li> <li>• Box 6.1 could be clearer on how the issues will be overcome and ensure that there will be a positive strategy for the historic environment in the Local Plan.</li> <li>• Table 11.1 add in the term 'heritage assets' to ensure that the terminology from the National Planning Policy Framework (NPPF) is included within the text. Could consider number of applications approved against heritage advice as a criteria.</li> <li>• We welcome having a separate indicator for cultural heritage.</li> <li>• We support the inclusion of documents in A5.</li> </ul>	<p>Potential effects on Archaeological Priority Areas (APAs) have been considered in the assessments within SA Objective 1.</p> <p>The SA seeks to include a proportionate assessment of effects on cultural heritage, using the available information and whilst acknowledging that SA is a high-level assessment.</p> <p>The SA Framework has been updated to ensure reference is made to heritage assets in the objective name (see <b>Table 2.1</b> and <b>Appendix A</b>).</p> <p>Other recommendations have been taken into consideration and fed back to the Council, where relevant. This includes policy recommendations presented in <b>Chapter 8</b>.</p>
Environment Agency	<p><b>4. Biodiversity, Flora, Fauna and Geodiversity</b>                  We support the key issue in Box 4.1 stating 'There is a need to establish a coordinated and comprehensive GI network providing connectivity between biodiversity sites, green spaces, watercourses and other environmental features across the DLP area and wider Black Country.' The baseline and key issues should have also picked up the current ecological status of water bodies across the DLP area, as the status of the water body is also an indicator of its ecological health. Watercourses are linear habitats that can provide important connections between other habitat sites and features. Our Catchment Data Explorer is available and accessible to identify the current status of water bodies.</p> <p>The Severn River Basin Management Plan (2022) provides information as to the programme of measures and objectives to enable water bodies to reach good ecological status or potential.</p> <p>We also thought there should be a more holistic consideration of how the current local designated sites (SINCs etc) and the England Tree Action Plan will link in with the Local Nature Recovery Network and Biodiversity Net Gain.</p> <p><b>5. Climatic Factors</b>                  Of relevance to the section on 'Flooding' (5.2.4-5.2.8) is the 'Flood risk assessments: climate change allowances' guidance which was updated on 20th July 2021 and is available to inform</p>	<p>The ecological and chemical status of watercourses was discussed within paragraph 10.2.13 of the SA Scoping Report.</p> <p>The most recent information and evidence identified in correspondence with the Council has been used to inform the SA. This includes the latest information made available by the Council regarding Indicative Flood Zones, taking into account climate change effects, have been used to inform the assessments in the SA, alongside the most recent fluvial and surface water flooding data from the EA (see <b>Appendix B</b>).</p>

Consultee	Summary of Consultation Response	Incorporation into the SA
	<p>both Strategic Flood Risk Assessments and site-specific Flood Risk Assessments.</p> <p>Latest climate science and research shows peak river flows could more than double by 2100 in some locations. Our guidance promotes a robust approach to climate resilience, based on the high emission scenario of UKCP18, with the central allowance representing a 4°C increase by 2100. This ensures our guidance is based on the latest evidence on the global climate change pathway we are currently following, reflected in UNEP Adaptation Gap report (Jan 2020), which states we are heading for a 3°C temperature rise this century, but this could be as high as 4°C.</p> <p>This guidance was updated in line with the latest climate change projections and research on flooding from rivers. Peak river flow allowances are provided to smaller geographic areas called management catchments which better reflects the variability in how different catchments will respond to the impact of climate change.</p> <p>We welcome the reference in 5.2.6 to the Level 1 Strategic Flood Risk Assessment for the Black Country which was carried out as part of the evidence base for the former draft BCP. We agree with the conclusion that it should be updated to account for the proposed plan period in the emerging DLP. It's also prudent given the update to the Climate Change Allowances guidance (as mentioned above) and to check for any local updates to the Environment Agency's modelling.</p> <p>Additional emphasis should be placed on ensuring that developments are located outside of the design flood event, including an allowance for climate change in section 5.2.7. Land that is required for current and future flood management must be safeguarded from development. If the DLP following the sequential test found it was not possible for development to be located in areas with a lower risk of flooding, the requirements of paragraphs 163 and 164 of the NPPF would apply. A level 2 SFRA would be required.</p> <p>Box 5.1 summarises the nature of flood risk for Dudley including flash flooding from excessive overland flow. To conclude this top paragraph, there is a need to ensure a minimum eight metre easement between built development and rivers, and even larger easements to allow for flood storage and conveyance and the natural movement of a watercourse during a development's lifetime. There is also a need to naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground culverts, to provide biodiversity benefits and amenity improvements.</p> <p>Instead of 'Climate change has the potential to increase the risk of flooding' it should state 'the frequency and severity of flooding is set to increase due to the impacts of climate change.'</p> <p><b>10. Water and Soil Resources</b>  <b>10.2.7-10.2.11</b></p> <p>Whilst we support reference to the current Water Resources Management Plans (WRMPs) 2019 by Seven Trent Water and South Staffordshire Water, the baseline should also be informed by the draft WRMPs 2024. The reason for this is that the draft WRMPs will have been informed by the latest sustainability reductions to abstraction licences issued nationally by the Environment Agency in November 2021 and will more accurately reflect the baseline situation for environmental capacity of groundwater abstraction. Severn Trent's draft WRMP24 Non-</p>	<p>Other recommendations have been taken into consideration and fed back to the Council, where relevant. This includes policy recommendations presented in <b>Chapter 8</b>.</p>



Consultee	Summary of Consultation Response	Incorporation into the SA
	<p>Technical Summary (page 11) touches on the challenges as follows: "<i>Overall, future pressures mean that our draft plan describes a likely future supply / demand deficit of 244Ml/d by plan year 2040-2041 growing to 540Ml/d by 2050-2051. Our previous WRMPs have not had to deal with deficits on this scale.</i>"</p> <p>Section 10.2.11 references the Catchment Area Management Strategies relevant for the Dudley Local Plan area, but this section would have benefitted from a general synopsis of what those plans say about the water resources situation in those catchments. For example, to protect water dependant environments, the groundwater management units in both the Tame, Anker and Mease and the Worcestershire Middle Severn catchments are designated as 'Restricted water available for licensing' or 'Water Not Available for Licensing.' No new consumptive abstractions will be granted. In addition, page 32 outlines the current Water Framework Directive classifications for groundwater bodies, for example, the Tame Anker Mease PT Sandstone Birmingham Lichfield groundwater body is at 'Poor' quantitative status and at risk of further deterioration.</p> <p>We agree with 10.2.10 that undertaking a Water Cycle Study can help identify joined up and cost-effective solutions resilient to climate change. Although the findings of the Phase 1 WCS Scoping Study may remain applicable to the preparation of the Dudley Local Plan, given the transition from current water company plans to finalising WRMP24 and DWMP24, an update of the evidence base may be necessary. This will help to ensure the local plan meets the requirements of paragraph 20 (b) of the National Planning Policy Framework, specifically setting out the provision water supply and wastewater infrastructure in strategic policies. The spatial distribution and timing of growth in the emerging DLP should be informed by these plans to ensure sustainable water supplies and waste water services also serve to protect the environment as well as providing for new development.</p> <p>We recommend that you refer to our publication 'The Environment Agency's Approach to Groundwater Protection' (2018), on <a href="http://www.gov.uk">www.gov.uk</a> - to get a better understanding of the issues relating to protection of groundwater. This document sets out a framework for our regulation and management of this precious resource and describes our aims and objectives for groundwater, our technical approach to its management and protection, the tools we use to do our work and our policies and approach to the application of legislation.</p> <p>Under 'Water Quality' section 10.2.14 provides a summary with regards to Groundwater Source Protection Zones. We can offer the following information:</p> <p>The area covered by the Dudley Local Plan is largely made up of the Etruria Formation sandstone and mudstone strata, designated as Secondary A aquifers. Secondary A Aquifers comprise permeable layers that can support local water supplies, and may form an important source of base flow to rivers. The area also contains some more important Principal sandstone aquifers towards the western boundary of the Local Plan area. Principle Aquifers are layers of rock or drift deposits that have high intergranular and/or fracture permeability - meaning they usually provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. There are also several groundwater Source Protection Zones designated towards the west of the area covered by the Local Plan, these include</p>	

Consultee	Summary of Consultation Response	Incorporation into the SA
	<p>designation for abstractions for public drinking water supply. There are also numerous surface waters bodies within the area covered by the Local Plan.</p> <p>We recommend there should be specific references to the hydrogeological environment and to issues such as groundwater and surface water protection (quality and quantity), contaminated land assessment (and clean-up where needed) and indeed the legislative drivers underpinning this, such as Environmental Permitting Regulations and Water Framework Directive.</p> <p>As noted within section 10.2.6, Dudley and the surrounding area are affected by the legacy of mining and industrial processes. It is anticipated that development proposals within the DLP will require site-specific assessments of ground contamination and effective remediation of soils affected prior to development. We note the presence of several historic landfills located within the area covered by DLP. Due to the age of some historic landfills, they may be unlikely to have been lined or capped and consequently it may well have allowed infiltration (from rainfall) to pass through. This can have an impact on the quantity of contamination which may remain to pose a risk to 'Controlled Waters' receptors and consequently the effect on the development potential of such sites. Prior to any development taking place on or in proximity to historic landfills, we recommend that the extent and significance of any remaining contamination is assessed to determine the need for remedial actions.</p>	

## 1.10 Signposting for this report

- 1.10.1 This Regulation 18 SA Report sets out an assessment of reasonable alternatives, or 'options', identified by DMBC during the preparation of the Draft DLP. These relate to spatial options for growth and development sites. The SA also contains an assessment of each draft policy as set out in the Draft DLP.
- 1.10.2 The Regulation 18 SA comprises two volumes. This document (**Volume 1**) is structured as follows:
- **Chapter 1** (this chapter) sets out the purpose, context and introduction to the DLP and the accompanying SA process.
  - **Chapter 2** sets out the methodology used to present and assess the findings of the SA process.
  - **Chapter 3** presents the assessment of the housing spatial growth options.
  - **Chapter 4** presents the assessment of the employment spatial growth options.
  - **Chapter 5** presents the assessment of the Gypsy and Traveller spatial growth options.
  - **Chapter 6** summarises the SA findings in relation to the assessment of proposed policies.
  - **Chapter 7** summarises the SA findings in relation to the assessment of reasonable alternative development sites and presents selection and rejection information. Mitigation information is also set out.

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- **Chapter 8** sets out a range of recommendations to improve the DLP policies and general recommendations for the Council to consider through the plan making process.
  - **Chapter 9** sets out the conclusions of this Regulation 18 SA and outlines the next steps.

1.10.3 **Volume 2** of the SA comprises the appendices, which provide essential contextual information to the main body of the report. **Volume 2** is structured as follows:

- **Appendix A** presents the SA Framework.
- **Appendix B** presents the topic-specific methodology used to assess reasonable alternative sites.
- **Appendix C** presents the assessment of reasonable alternative sites.
- **Appendix D** presents the assessment of the Draft DLP policies from Part 1 of the plan (Spatial Strategy and Policies).
- **Appendix E** presents the assessment of the Draft DLP policies from Part 2 of the plan (Allocations and Centres).

## 2 Assessment methodology and scope of appraisal

### 2.1 Assessment of reasonable alternatives

2.1.1 Each of the reasonable alternatives or options appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in **Appendix A**, is comprised of 14 SA Objectives. **Table 2.1** summarises the SA Objectives and their relevance to the SEA themes (Schedule 2).

*Table 2.1: Summary of SA Objectives*

	SA Objective	Relevant SEA Topic
1	<b>Cultural heritage:</b> Protect, enhance and manage heritage assets including 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 and 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 Dudley’s contribution to climate change.	Climatic factors
5	<b>Climate change adaptation:</b> Plan for the anticipated levels of climate change.	Climatic factors, soil, 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.	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 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.	Population and human health
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

	SA Objective	Relevant SEA Topic
14	<b>Education, skills and training:</b> Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	Population

- 2.1.2 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations<sup>20</sup>. Including the SEA topics in the SA Objectives helps to ensure that all of the environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure that the assessment process is transparent, robust and thorough.
- 2.1.3 It is important to note that 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 focus each objective, decision-making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.
- 2.1.4 The purpose of this document is to provide an appraisal of reasonable alternatives, also known as 'options', in line with Regulation 12 of the SEA Regulations<sup>21</sup>:
- 2.1.5 *"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".*
- 2.1.6 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 2.1**).

<sup>20</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)."

<sup>21</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: 17/08/23]

**Box 2.1: Schedule 1 of the SEA Regulations<sup>22</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 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.

## 2.2 Impact assessment and determination of significance

2.2.1 Significance of effect is a combination of impact sensitivity and magnitude. Impact sensitivity can be expressed in relative terms, based on the principle that the more sensitive the resource, the greater the magnitude of the change, and as compared with the do-nothing comparison, the greater will be the significance of effect.

## 2.3 Sensitivity

2.3.1 Sensitivity has been measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether or not environmental quality standards will be exceeded, and for example, if impacts will affect designated areas or landscapes.

2.3.2 A guide to the range of scales used in determining impact sensitivity is presented in **Table 2.2**. For most receptors, sensitivity increases with geographic scale.

<sup>22</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: 17/08/23]

**Table 2.2:** *Impact sensitivity*

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

## 2.4 Magnitude

2.4.1 Magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined on the basis of the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 2.3**).

**Table 2.3:** *Impact magnitude*

Impact magnitude	Typical criteria
High	<ul style="list-style-type: none"> <li>Likely total loss of or major alteration to the receptor in question;</li> <li>Provision of a new receptor/feature; or</li> <li>The impact is permanent and frequent.</li> </ul>
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: <ul style="list-style-type: none"> <li>Frequent and short-term;</li> <li>Frequent and reversible;</li> <li>Long-term (and frequent) and reversible;</li> <li>Long-term and occasional; or</li> <li>Permanent and occasional.</li> </ul>
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: <ul style="list-style-type: none"> <li>Reversible and short-term;</li> <li>Reversible and occasional; or</li> <li>Short-term and occasional.</li> </ul>

## 2.5 Significant effects

2.5.1 A single value from **Table 2.4** has been allocated to each SA Objective for each reasonable alternative. 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.

2.5.2 The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations, where feasible, which states that the effects should include: “short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects”.

**Table 2.4:** Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	The size, nature and location of a development proposal would be likely to: <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>
Minor Negative -	<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>
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive +	The size, nature and location of a development proposal would be likely to: <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>
Major Positive ++	The size, nature and location of a development proposal would be likely to: <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>

2.5.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of an option in terms of the relevant SA Objective, the precautionary principle<sup>23</sup> has been used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the second column of the SA Framework in **Appendix A**) 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 are indicative summarily and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option.

<sup>23</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,



- 2.5.4 For the assessment of reasonable alternative sites, to enable further transparency and to provide the reader with contextual information that is relevant to each SA Objective, the full assessments presented in the SA report appendices have been set out per 'receptor'. The methodology used to assess reasonable alternative sites throughout the SA process, which sets out the receptors considered for each SA Objective, is presented in **Appendix B**.
- 2.5.5 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).
- 2.5.6 The level of effect has been categorised as minor or major. 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.
- 2.5.7 Each reasonable alternative or option that has been identified in this report has been assessed for its likely significant impact against each SA Objective in the SA Framework, as per **Table 2.4**. Likely impacts are not intended to be summed.
- 2.5.8 It is important to note that the assessment scores presented in **Table 2.4** are high level indicators. The assessment narrative text should always read alongside the significance scores. A number of topic specific methodologies and assumptions have been applied to the appraisal process for specific SA Objectives (see **Appendix B**), offering further insight into how each significant effect score was determined. These should be borne in mind when considering the assessment findings.

## 2.6 Limitations of predicting effects

- 2.6.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.
- 2.6.2 The assessments in this report are based on the best available information, including that provided to Lepus by the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.
- 2.6.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.

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*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".*

- 2.6.4 The assessment of development proposals is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available. The appraisal of the DLP is limited in its assessment of carbon emissions, and greater detail of carbon data would help to better quantify effects. Further topic-specific limitations and assumptions for the assessment of reasonable alternative sites are set out in **Appendix B**.
- 2.6.5 All data used is secondary data obtained from the Council or freely available on the Internet.
- 2.6.6 All distances stated in assessments are measured 'as the crow flies' from the closest point of the site/receptor in question, unless otherwise stated.

## 2.7 Methodology for assessment of spatial growth options and policies

- 2.7.1 The appraisal of spatial growth options (housing, employment and Gypsy and Traveller) and draft policies aims to assess the likely significant effects of each proposed option, based on the criteria set out in the SEA Regulations (see **Box 3.1**).
- 2.7.2 **Table 2.5** sets out a guide to how likely impacts have been determined in the assessment of options within this report.

*Table 2.5: Presenting likely impacts*

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed option prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

- 2.7.3 The appraisal commentary provided should be read alongside the identified impact symbols, as it is often difficult to distil the wide-ranging effects of a broad growth option into one overall impact.

# 3 Assessment of Housing Spatial Growth Options

## 3.1 Preface

- 3.1.1 Paragraph 61 of the NPPF states that the minimum number of homes needed in an area should be informed by a local housing need assessment, conducted using the standard method outlined in PPG<sup>24</sup>, unless the local authority feel that circumstances warrant an alternative approach.
- 3.1.2 The NPPF also states that “*any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for*”.
- 3.1.3 Based on the most up to date national standard method housing calculation, the identified housing need to 2041 for Dudley is 11,954 homes.
- 3.1.4 DMBC have identified three spatial options for housing growth within Dudley, as presented in **Table 3.1**.

**Table 3.1:** Dudley housing spatial growth options identified by DMBC

Housing Option	Description of Housing Spatial Growth Option
<b>Option 1: Meeting the majority of our needs in the urban area alone and maintaining the existing ‘brownfield first’ strategy.</b>	Under this option Dudley would be looking to accommodate Dudley’s housing need within the urban area. This would be met by allocating predominantly brownfield sites.
<b>Option 2: Meeting the majority of our housing need through urban uplift in regeneration corridors and centres plus some development proposed on smaller areas of low-quality open space.</b>	This option would result in site allocations being designated within the urban area, which would include a predominate supply of brownfield sites and some low-quality open space sites with a focus on increased densities and maximising capacity and raising densities within centres and regeneration corridors, where appropriate. Where it can be demonstrated that accessibility standards are met, developments would be expected to meet 40dph except where this would prejudice historic character and local distinctiveness. <u>Under this option Dudley would look to accommodate the majority of its housing need of new homes within the urban area but would have a potential shortfall in its housing supply.</u>
<b>Option 3: Meeting all or the majority of our housing need through urban uplift in regeneration corridors and centres, some development proposed on smaller areas of low-quality open space, plus DtC contributions. To be formulated for Reg 19 stage of the DLP.</b>	This option would result in site allocations being designated within the urban area, which would include a predominate supply of brownfield sites and some low-quality open space sites with a focus on increased densities and maximising capacity and raising densities within centres and regeneration corridors, where appropriate. Where it can be demonstrated that accessibility standards are met, developments would be expected to meet 40dph except where this would prejudice historic character and local distinctiveness. <u>Under this option Dudley would look to accommodate its housing need of new homes within the urban area but would require a contribution from DtC partners towards the potential shortfall to enable the total housing need for the borough to be met.</u>

<sup>24</sup> DLUHC and MHCLG (2020) Planning Practice Guidance. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [Date accessed: 12/09/23]

3.1.5 Each option has been assessed for its likely sustainability impacts, a summary of which is presented in **Table 3.2**. Full explanations and reasonings behind each overall 'score' outlined in **Table 3.2** are set out per SA Objective in the following sections of this appendix. Best performing options have been identified within each SA Objective.

**Table 3.2: Impact matrix of the three housing spatial growth options**

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Housing Spatial Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
1	+/-	+/-	-	-	-	+	-	-	+	+	-	+	+	+
2	+/-	+/-	-	-	-	-	-	-	++	+	+/-	+	+	+
3	+/-	+/-	-	-	-	-	-	-	++	++	+/-	+	+	+

## 3.2 Assessment

### SA Objective 1 – Cultural Heritage

- 3.2.1 The majority of cultural heritage assets within the DLP area are concentrated in the urban area of Dudley. This includes two Registered Parks and Gardens (RPGs), 12 Scheduled Monuments (SMs), 34 Conservation Areas (CAs) and 270 Listed Buildings.
- 3.2.2 All three housing options propose to deliver a large quantity of new homes in the urban area, and as such, it is likely that a large proportion of housing would be located in proximity to designated heritage assets, with potential to adversely affect their historic significance and their settings. On the other hand, by encouraging growth within these areas, development could also help to promote regeneration, and enhance the cultural heritage value and appreciation of historic features. Options 2 and 3 include focus on regeneration corridors and so may provide opportunities for positive effects in this regard, as well as through seeking higher densities in locations “*except where this would prejudice historic character and local distinctiveness*”.
- 3.2.3 Overall, as the location, site context and proximity to receptors of the proposed housing provision is unknown, the potential impacts of all the housing growth options on cultural heritage features is uncertain.

- 3.2.4 On the whole, all options may deliver a similar number of homes within Dudley itself, although Options 2 and 3 include a stronger focus on regeneration corridors with potentially greater scope for achieving positive heritage-led regeneration. However, Option 1 would not include development on open spaces as for Options 2 and 3, where visual effects or changes to settings may be most pronounced. The outcome of Option 3 is the most uncertain since development within Dudley should be the same as Option 2, but a proportion of growth would be exported through DtC and the location of development and cultural heritage impacts outside of Dudley Borough are unknown. As such, Option 2 could be seen as the (marginally) best performing option overall.

### **SA Objective 2 – Landscape**

- 3.2.5 The majority of Dudley is urbanised, although areas of Green Belt remain to the south and western edges of the borough, which contain some areas of high sensitivity to development<sup>25</sup>. Since none of the proposed options indicate housing development within the Green Belt, the openness of the landscape in these areas will be safeguarded, as well as the role of the Green Belt in preserving the setting and character of towns. Furthermore, reusing brownfield sites and encouraging regeneration of urban landscapes could help to enhance the character and quality of the landscape/townscape.
- 3.2.6 However, all development of this scale would have potential to alter the existing character of Dudley's landscapes/townscapes and could lead to changes to views and local distinctiveness to some extent. As discussed under SA Objective 1, Dudley's urban areas also contain important heritage assets, and this also includes Areas of High Historic Townscape and Landscape Value (AHHTV/AHHLV)<sup>26</sup>. All options would be expected to deliver a similar level of growth. Although Option 1 proposes development predominantly within brownfield sites, it is unlikely that there would be sufficient brownfield sites to accommodate all the identified need. Option 2 proposes some low-quality open space sites to be used, which could be sites with more potential to improve the environment if they were left undeveloped. Without careful planning in terms of location, layout and design of development there is potential for adverse effects on valued townscapes/landscapes to occur as a result of the proposed housing growth.
- 3.2.7 Overall, as the location, site context and proximity to receptors of the proposed housing provision is unknown, the potential impacts of all the housing growth options on landscape is uncertain.

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<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: 20/06/23]

<sup>26</sup> 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](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date accessed: 07/08/23]

- 3.2.8 Similarly to the assessment under SA Objective 1, Option 2 and 3 would be expected to perform better than Option 1 due to their focus on urban regeneration, with potential benefits to the landscape/townscape character. Overall, Option 2 could potentially be preferable as it would deliver a lower overall housing number than Option 3 (although the same number within Dudley itself). The outcome of Option 3 is the most uncertain since development within Dudley should be the same as Option 2, but Option 3 also includes DtC requirements and the landscape impacts outside of Dudley Borough are unknown.

### **SA Objective 3 – Biodiversity, flora, fauna and geodiversity**

- 3.2.9 Dudley's biodiversity assets include one Habitats site, 'Fens Pools' Special Area of Conservation (SAC), as well as eight Local Nature Reserves (LNRs), two National Nature Reserves (NNRs), 10 Sites of Special Scientific Interest (SSSIs), 61 Sites of Importance for Nature Conservation (SINCs) and 160 Sites of Local Importance for Nature Conservation (SLINCs). Some priority habitats and areas of ancient woodland are also present within the borough. Undesignated aspects of the DLP area's green infrastructure (GI) network are also likely to serve as important corridors between habitats, facilitating movement of species.
- 3.2.10 Option 1 seeks to focus housing growth in the existing urban area, predominantly on brownfield sites. This option may therefore direct development away from the most sensitive biodiversity features, although it should be noted that urban areas also can support distinctive habitats, species and ecological linkages.
- 3.2.11 Option 2 will also focus housing growth in the existing urban area and regeneration corridors, as well as low-quality open space. Option 3 is similar to Option 2, although Option 3 proposes the housing shortfall to be exported to neighbouring boroughs which could lead to complications regarding Biodiversity Net Gain (BNG). BNG can be used as a tool to connect green spaces, improve GI and promotes "*bigger, better, joined up*" habitats. Since Option 3 looks to export a proportion of development to neighbouring boroughs, although BNG will still take place, there may be less benefit in terms of habitats and GI connections within Dudley itself.
- 3.2.12 It is likely that development under any option would place pressure on biodiversity resources, with adverse impacts at the landscape scale despite any BNG provisions at the site level, owing to the large quanta of housing proposed. All three options would potentially result in some loss of greenfield land within the urban area which, although would likely not be of significant ecological value, could cumulatively lead to a reduction in the available space for wildlife and loss of corridors or connections between habitats. A minor negative impact is therefore Identified for Options 1, 2 and 3. Assuming it would result in the lowest proportion of undeveloped land to be used, Option 1 could be seen as the best performing.

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

- 3.2.13 The majority of Dudley's CO<sub>2</sub> emissions are attributed to domestic and transport sources<sup>27</sup>. All options would be expected to deliver a similar number of dwellings within Dudley itself leading to similar domestic emissions, although Option 1 may deliver a slightly lower number since it does not propose to use open space sites or high-density development, like Options 2 and 3.
- 3.2.14 By delivering high density development in centres as much as possible, in accordance with accessibility standards, the majority of development under Options 2 and 3 should be in proximity to a range of existing jobs, services, facilities and sustainable transport infrastructure. Option 1 would direct a large proportion of housing growth to brownfield sites within the urban area, where it is likely that most development would be in relatively close proximity to existing jobs, services and sustainable transport infrastructure, although it does not specifically reference accessibility standards like Options 2 and 3.
- 3.2.15 Option 3 has similarities to Option 2. High density growth in urban areas and a potentially smaller number of homes delivered within Dudley compared to Option 1 would suggest lesser impacts on climate change mitigation. However, the requirement for DTC development occurring outside of Dudley under Option 3 may limit the ability of new housing developments to be linked to sustainable transport, as site locations are uncertain and may be more dispersed.
- 3.2.16 The construction and occupation of a significant number of new homes will inevitably produce emissions, but incorporation of zero or low-carbon designs, building techniques and materials can help to reduce such emissions, coupled with a focus on sustainable transport infrastructure. However, at this stage any potential modifications and technologies to be used within any of the three options are not known. Overall, all three options could potentially have a minor negative impact on SA Objective 4, due to the expected increase in CO<sub>2</sub> and other GHG emissions, but Option 2 would be preferable.

### **SA Objective 5 – Climate Change Adaptation**

- 3.2.17 Flood risk within Dudley is generally low, although there are some areas within Flood Zones 2, 3a and 3b. The frequency and severity of flooding is set to increase due to the impacts of climate change. It is possible to lessen these effects through development design and implementation of adaptive technologies such as Sustainable Drainage Systems (SuDS) but at this scale of assessment such detail is not known. Open spaces and GI can help urban areas adapt to climate change, for example through the providing protection from extreme weather such as hotter summers<sup>28</sup>, and helping to alleviate the 'urban heat island' (UHI) effect. Loss of GI within the urban area and greater urban density could therefore compromise these functions.

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<sup>27</sup> mySociety, Climate Emergency UK (2023). CAPE: Dudley Metropolitan Borough Council. Available at: <http://cape.mysociety.org/councils/dudley-metropolitan-borough-council/> [Date accessed: 14/08/23]

<sup>28</sup> Environment Agency (2018) Climate change impacts and adaptation. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/758983/Climate\\_change\\_impacts\\_and\\_adaptation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/758983/Climate_change_impacts_and_adaptation.pdf) [Date accessed: 12/09/23]

- 3.2.18 The focus of development under Option 1 within the existing urban area may help to reduce the proportion of previously undeveloped land required to deliver the housing, which would be less likely to exacerbate local surface water flood risk than development on existing open space. However, there may still be an increase in the area or density of built form and thereby the extent of impermeable surfaces. With the current wording of Option 1, it is unclear whether any development would occur on open spaces or undeveloped land if it is not feasible to deliver all the required homes within urban areas.
- 3.2.19 Option 2 proposes a proportion of new development to be located on low-quality open space, and so could result in some loss of GI and undeveloped land with adverse implications for adaptation to climate change. Option 2 does however propose high density development, which could lead to reduced land-take overall.
- 3.2.20 Option 3 proposes the same quantum of development within Dudley's urban area as Option 2, however, where Option 2 fails to meet Dudley's housing need, Option 3 will fulfil this by seeking housing contributions from DtC partners.
- 3.2.21 Overall, all three options would potentially lead to minor negative impacts on climate change adaptation. Option 3 would be preferable in terms of having the smallest negative effects within Dudley itself, as it would potentially place the least pressure on existing open spaces whilst still meeting Dudley's housing needs. However, it must be noted that under this option, climate change adaptation impacts outside of the borough are uncertain due to unknown locations of DtC developments.

### **SA Objective 6 – Natural Resources**

- 3.2.22 The majority of the land within Dudley is classified as Agricultural Land Classification (ALC) 'urban' with a small pocket of 'non-agricultural' land in the north east of the borough and an area of Grade 3 land in the south. Small extents of Grade 2 land can be found in the south and north west of the borough. There are no Mineral Safeguarding Areas (MSAs) in Dudley. It can be assumed that development focused in the existing urban area would not result in the loss of any 'best and most versatile' (BMV) agricultural land and would be unlikely to compromise mineral resources.
- 3.2.23 All three options aim for development mainly in the existing urban area, with benefits in terms of the efficient use of natural resources. Options 2 and 3 seek to deliver higher density developments, where appropriate. Whilst higher density developments would represent a more efficient use of land with positive effects in terms of the conservation of natural resources, these options would also result in some development on "*low-quality open space sites*". Although this would likely be a small area of land, it could lead to loss of undeveloped land potentially including ecologically or environmentally valuable soil.
- 3.2.24 Whereas, under Option 1, open spaces are not proposed to be developed and the most focus is placed on brownfield development, which would have potential to achieve a minor positive impact on natural resources overall. Option 1 could therefore be the best performing option.



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### **SA Objective 7 – Pollution**

- 3.2.25 The entirety of the DLP area falls within Dudley AQMA, meaning that any of the housing options would introduce new development into the AQMA and likely expose new residents to poor air quality. The proposed development could also potentially exacerbate existing congestion issues with implications for air pollution.
- 3.2.26 The implications for soil and water pollution will depend on the nature, scale and location of development. Option 1 proposes to focus development on brownfield locations and would not seek to use open spaces for housing. Options 2 and 3 would also include a large proportion of development within the urban area including brownfield sites, however these options also look to increase densities where appropriate and would utilise some low-quality open spaces for new housing.
- 3.2.27 Given the focus of all options to develop largely on brownfield sites, there is potential for existing contaminated land to be remediated. Therefore, there is potential to positively impact groundwater pollution, but when considering pollution as a whole, this will likely be outweighed by increased air and noise pollution caused by the proposed scale of development.
- 3.2.28 Option 2 or 3 could be more favourable for SA Objective 7 than Option 1 as the focus on centres and high density development may enable easier management and mitigation of pollutants, in terms of utilising existing infrastructure.
- 3.2.29 Overall, all housing options would be expected to expose new residents to pollution to some degree and generate further pollution during both construction and occupation, owing to the large scale of development proposed. A minor negative impact is recorded for all three options.

### **SA Objective 8 – Waste**

- 3.2.30 All options for housing growth would be likely to increase household waste production. It is assumed that new residents in the DLP area will have an annual waste production of approximately 399kg per person, in line with the average for England<sup>29</sup>.
- 3.2.31 All options would be expected to deliver a similar number of homes within Dudley itself, leading to similar impacts in terms of the generation of waste, although Option 1 may deliver a slightly lower number since it does not propose to use open space sites or high-density development, like Options 2 and 3. Furthermore, Option 3 would seek to meet the housing shortfall through DtC contributions outside of Dudley meaning this option would likely lead to the highest quantum of growth overall.

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<sup>29</sup> DEFRA (2021) Statistics on waste managed by local authorities in England in 2020/21. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1040756/Statistics\\_on\\_waste\\_managed\\_by\\_local\\_authorities\\_in\\_England\\_in\\_2020\\_v2rev\\_accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040756/Statistics_on_waste_managed_by_local_authorities_in_England_in_2020_v2rev_accessible.pdf) [Date accessed: 12/09/23]

3.2.32 The three housing options do not provide sufficient information to be able to accurately predict the effect each option would have in terms of encouraging recycling or reuse of waste and promoting sustainable resource and waste management. Overall, all options would be likely to significantly increase household waste, as well as waste produced during the construction phase, and result in a minor negative impact on SA Objective 8. Option 1 could be seen as the best performing, assuming it would deliver the lowest housing growth.

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

3.2.33 All three options aim to focus growth within Dudley's existing urban areas. In particular, under Options 2 and 3 there is a focus on development within centres where there is the greatest provision of sustainable transport infrastructure, including active travel links and public transport options such as buses, metro and rail. Both Options 2 and 3 would ensure that higher density developments are delivered where accessibility standards are met.

3.2.34 It is anticipated that new residents in the centres would be more likely to choose sustainable travel options rather than private car use, compared to more dispersed housing, making Options 2 and 3 favourable over Option 1. Since Option 3 will seek DtC development, accessibility to sustainable transport is uncertain for the unmet housing need that will be located outside of the Plan area.

3.2.35 This scale of development has potential to cause congestion and put pressure on local transport networks, under any option. However, assuming there is sufficient capacity in the transport network to accommodate this growth, overall, a minor positive impact would be expected for Option 1, and a major positive impact for Options 2 and 3 given their reference to accessibility standards. Option 2 could be seen as performing marginally better than Option 3 because there would be less uncertainty in the location of new homes, although the impacts within Dudley itself would likely be the same.

### **SA Objective 10 – Housing**

3.2.36 Under Option 1, the majority of the housing need would be met within Dudley, although there are unlikely to be sufficient brownfield sites available to fully meet needs, and therefore a minor positive impact on housing can be expected. Option 2 would not deliver enough housing to meet the identified need, however, it will still provide a significant number of new homes and therefore is still likely to have a minor positive impact.

3.2.37 Option 3 would be expected to meet the identified housing requirement, leading to a major positive impact on housing provision, assuming that DtC partners are willing. Option 3 would therefore be the best performing option in terms of housing.

3.2.38 It should be noted that at this scale of assessment, the likely contribution of each housing growth option to meeting the different needs of the population is uncertain, such as housing mix, and provision of extra care housing, accessible housing and affordable homes.

### **SA Objective 11 – Equality**

3.2.39 According to the Index of Multiple Deprivation (IMD), the most deprived areas of Dudley are generally found in the central areas.

- 3.2.40 Growth directed towards the existing urban areas could potentially help to facilitate social inclusion by increasing accessibility to key services and employment opportunities; however, this could also lead to exacerbation of existing inequalities by increasing housing density in deprived areas (particularly under Options 2 and 3). Increased housing in the urban areas may also lead to greater pressure on existing open spaces and potential conversion of non-residential land uses into residential properties.
- 3.2.41 Option 3 would meet the identified housing need for Dudley (although a proportion of this growth would be in neighbouring authorities). This option may therefore be more likely to ensure provision of a suitable mix of housing types / tenures and allow greater scope to meet the varying needs of the population, such as provision of affordable homes, compared to Options 1 and 2 which would result in a housing shortfall. By not meeting housing needs, Options 1 and 2 could also put pressure on housing and rental costs, which could potentially lead to poorer quality accommodation and overcrowding, with adverse implications for health and wellbeing.
- 3.2.42 As the location, site context and proximity to receptors of the proposed housing provision is unknown, there is some uncertainty regarding the potential impacts of all housing growth options on equality. Option 1 would be more likely to lead to a minor negative impact on equality overall, whereas there is greater uncertainty for Options 2 and 3. Although, Option 3 would likely be the best performing given it is the only option which would fully satisfy the housing need.

### **SA Objective 12 – Health**

- 3.2.43 The majority of Dudley is well served by healthcare facilities, with Russells Hall Hospital located centrally in the borough and various GP surgeries distributed across the urban area. The majority of the built-up area has good pedestrian and public transport access to healthcare. Various open spaces, parks and sports facilities can be found throughout the DLP area, providing areas for exercise and recreation, although new development may put pressure on open spaces.
- 3.2.44 All options direct housing growth towards the existing urban area where the majority of existing healthcare facilities are concentrated. This may therefore result in the majority of new residents being located in areas with good sustainable access to these facilities under any option.
- 3.2.45 Although, it should be noted that the high-density development within centres proposed under Options 2 and 3 could potentially lead to capacity issues at healthcare facilities and increased pollution with implications for health. These two options would also put pressure on urban greenspaces for development, with potential adverse effects on health associated with loss of, or reduced access to, outdoor space for exercise and recreation. It is unclear specifically where new growth would be accommodated under Option 1, as it does not state the use of higher densities or open spaces for development.
- 3.2.46 Overall, all three options could potentially have a minor positive impact on health as they will ensure a large number of new residents are located within sustainable distances of hospitals and GP surgeries.

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### **SA Objective 13 – Economy**

- 3.2.47 The options considered in this assessment focus only on housing growth. It is assumed that future housing development would not result in the loss of existing employment floorspace.
- 3.2.48 In terms of accessibility of proposed new housing growth to employment opportunities, the majority of the DLP area would be expected to provide relatively good connections. A range of employment opportunities including retail, commercial and office floorspace can be found in the DLP area, particularly the main centres. The DLP area is also well served by public transport to nearby centres such as Birmingham and the wider Black Country.
- 3.2.49 In general, it is expected that the development focused within the existing urban area would provide good access to the greatest range of employment opportunities as well as sustainable transport options to reach employment further afield. Options 2 and 3 would ensure that higher density development is delivered in line with accessibility standards, which would be expected to include accessibility to employment.
- 3.2.50 All options would be likely to result in a minor positive impact on economy associated with the new housing growth. Overall, Option 2 would be preferable as although it does not meet the housing need, it would provide a large number of high-density homes with good access to employment opportunities. Although development under Option 1 will meet the housing need, development is likely to be less concentrated in centres and therefore, sustainable access to employment is less certain than Option 2. Option 3 would also perform relatively well due to meeting the housing need and providing high density housing, however access to employment opportunities for the exported homes that will be developed under DtC is unknown.

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

- 3.2.51 The majority of the DLP area has good pedestrian and public transport access to a number of primary and secondary schools.
- 3.2.52 All three housing options seek to focus growth in the existing urban area, and Options 2 and 3 include increased housing density in accessible locations. This approach would be likely to ensure that the majority of new development is situated in areas with good sustainable access to education; however, it is uncertain whether the associated increase in population density would lead to adverse effects in terms of capacity issues at schools.
- 3.2.53 The proposed locations of new developments are relatively similar across Options 1, 2 and 3. Overall, all options would be likely to have a minor positive impact in terms of access to education, skills and training opportunities. Options 2 and 3 would be likely to perform better than Option 1 given the focus on increasing density where accessibility standards are met. Option 3 offers a similar growth strategy to Option 2 but a small proportion of this would be located outside of the DMBC area, where there is greater uncertainty in terms of location with respect to schools and education.

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### 3.3 Conclusions

- 3.3.1 When assessing the housing spatial options against the 14 SA Objectives, there is very little separating Options 1, 2 and 3 and it is difficult to identify a single best performing option. All would be expected to deliver a similar level of growth within Dudley.
- 3.3.2 All options would be likely to perform positively in terms of access to transport infrastructure, healthcare, employment opportunities and education (SA Objectives 9, 12, 13 and 14). Although, Options 2 and 3 would be likely to perform better than Option 1 in these areas due to their requirement to demonstrate that accessibility standards are met.
- 3.3.3 Conversely, Option 1 could potentially perform better than Options 2 and 3 in terms of natural resources (SA Objective 6) due to the reduced scope for development on previously undeveloped land.
- 3.3.4 The potential for adverse effects on several of the SA Objectives, such as on biodiversity, climate change mitigation/adaptation, pollution and waste (SA Objectives 3, 4, 5, 7 and 8) will depend upon the scale, nature and design of the development at the site level.
- 3.3.5 Overall, Option 3 appears to be the most favourable housing spatial growth option as it ensures the housing need will be met, although there is also some uncertainty in the impacts of this option given the unknown location of the exported proportion of growth.

### 3.4 Selection and Rejection

- 3.4.1 Considering the SA findings alongside other evidence base information, DMBC have determined the following:
- Option 1 – rejected - would not sufficiently meet housing needs in the Borough.
  - Option 2 - rejected - would not sufficiently meet housing needs in the Borough.
  - Option 3 – selected – would address housing need through a balanced spatial approach.

# 4 Assessment of Employment Spatial Growth Options

## 4.1 Preface

4.1.1 Dudley is located within the Black Country Functional Economic Market Area (FEMA) which also covers the local authorities of Sandwell, Walsall and Wolverhampton. The Black Country Economic Development Needs Assessment (EDNA) update (September 2023) identifies a demand for 516ha of employment land between 2020 to 2041 across the FEMA as a whole, including 72ha for Dudley MBC. The current employment land supply to 2041 in Dudley is 25ha, leaving a shortfall of 47ha.

4.1.2 Two spatial options for employment growth have been identified by DMBC (see **Table 4.1**). These options include distributions of employment land across the borough and exported through DtC.

*Table 4.1: Dudley employment land spatial growth options identified by DMBC*

Employment Option	Description of Employment Land Spatial Growth Option
<b>Option 1: Meeting the majority of our employment land needs in the urban area alone and maintaining the existing 'brownfield first' strategy.</b>	This option would result in site allocations being designated within the urban area, which would include a predominate supply of brownfield sites, it is unlikely that there would be suitable greenfield sites for employment land available, within the urban area. <u>Under this option Dudley would look to accommodate all of its employment land within the urban area.</u>
<b>Option 2: Meeting all or the majority of our employment land needs in the urban area alone and maintaining the existing 'brownfield first' strategy, plus DtC contributions. To be formulated for Reg 19 stage of the DLP.</b>	This option would result in site allocations being designated within the urban area, which would include a predominate supply of brownfield sites and also a contribution from DtC partners to meet a potential shortfall of employment land over the plan period. <u>Under this option Dudley would look to accommodate its employment land within the urban area but would require a contribution from DtC partners towards the potential shortfall of employment land to enable the total employment land need for the borough to be met. This will be addressed by the BC FEMA.</u>

4.1.3 Each option has been assessed for its likely sustainability impacts, a summary of which is presented in Table 4.2. Full explanations and reasonings behind each overall 'score' outlined in Table 4.2 are set out per SA Objective in the following sections of this appendix. Best performing options have been identified within each SA Objective.

**Table 4.2:** Impact matrix of the two employment land spatial growth options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Employment Spatial Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
1	+/-	+/-	+/-	+/-	+/-	+	-	-	+	0	+	0	+	+
2	+/-	+/-	+/-	+/-	+/-	+	-	-	+	0	+	0	++	+

## 4.2 Assessment

### SA Objective 1 – Cultural Heritage

- 4.2.1 The majority of heritage assets are found within the urban area of Dudley; this includes two RPGs, 12 SMs, 34 CAs, and 270 Listed Buildings. As both options propose development within the existing urban area there is potential for the significance or setting of these heritage assets to be affected by new development.
- 4.2.2 On the other hand, developments within the urban setting may provide opportunities for regeneration with potential benefits to the historic environment as areas are redeveloped, in terms of improving character and quality. The urban focus may also direct new growth within areas that are already characterised by employment land uses, meaning the new development is more likely to be in keeping with the existing built form.
- 4.2.3 Overall, as the specific site context and proximity to receptors of the proposed employment provision are unknown, the potential impacts of both employment growth options on cultural heritage features are uncertain. It is difficult to identify a preferred option without knowing the location of DtC contributions and without specific site locations within Dudley.

### SA Objective 2 – Landscape

- 4.2.4 Dudley is a mostly urban borough with areas of Green Belt distributed mostly in the south and west. The areas to the south of the borough are considered to have 'high' or 'moderate-high' sensitivity to development. Both options would protect Green Belt land and aim to keep the majority of employment growth within the existing urban area on brownfield sites. However, Option 2 also requires a contribution of employment land from DtC partners. This could prevent some of Dudley's undeveloped land from being exploited, however, it could lead to negative environmental outcomes in neighbouring boroughs particularly if previously undeveloped land is used for development. Without knowing the exact areas of employment land DtC partners will supply, the impacts of this option are uncertain.
- 4.2.5 Assuming no undeveloped land is pursued under Option 1, this option could perform better with regard to landscape although there is still potential for localised adverse effects. There is greater uncertainty for Option 2 in terms of the location and nature of DtC contributions.

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### **SA Objective 3 – Biodiversity, flora, fauna and geodiversity**

- 4.2.6 There is one designated Habitats site within Dudley, 'Fens Pools' SAC, 10 SSSIs, two NNRs, eight LNRs, 61 SINCs and 160 SLINCs. Some priority habitats and areas of ancient woodland are also present within the borough. The locations of employment development within the two options with respect to these biodiversity sites are not known; however, any new development could cause adverse effects on designated and non-designated biodiversity assets within and surrounding the urban area through increased development pressures.
- 4.2.7 Option 1 indicates that "*it is unlikely that there would be suitable greenfield sites for employment land available, within the urban area*". As such, it is assumed that little or no undeveloped / greenfield land would be used under Option 1. However, it is unknown whether greenfield sites would be considered under Option 2 through DtC contributions. Loss of greenfield land could cumulatively lead to a reduction in the available space for wildlife and loss of corridors or connections between habitats. Option 1 could therefore have less potential for adverse effects on biodiversity within Dudley itself, whereas Option 2 would seek to use DtC partner contributions and negative impacts could occur within other local authorities.
- 4.2.8 New developments under either option would need to ensure a net 10% increase in biodiversity as per national BNG requirements, and therefore longer-term positive effects could occur.
- 4.2.9 With consideration of all aforementioned points, the impacts of both options on biodiversity are uncertain with the current information available. Overall, Option 1 could be seen as preferable because keeping development within Dudley would provide a greater opportunity for BNG to remain within DMBC's control.

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

- 4.2.10 The construction and occupation of new employment developments will inevitably produce emissions, but incorporation of zero or low-carbon designs, building techniques and materials can help to reduce such emissions. Investments in public transport, walking and cycling provisions could help to reduce vehicular emissions and provide better access across the borough to reduce reliance on privately owned vehicles for travel to work. However, any potential climate change mitigation measures, including modifications and technologies to be used within both options are not known. Consequently, it is uncertain exactly what impact both options would have on climate change mitigation in Dudley. By focusing all growth within the existing urban areas, both options could potentially help to ensure that most new employment land is located in proximity to existing sustainable transport options. Option 2 would rely on DtC contributions to meet a portion of the identified employment land need, and so the location and associated impacts of this are uncertain.



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### **SA Objective 5 – Climate Change Adaptation**

- 4.2.11 GI and open spaces can help urban areas adapt to climate change by providing protection from extreme weather and helping to reduce the UHI effect. Soils and vegetation play vital roles in attenuating flood risk, by intercepting surface water and storing water that could otherwise lead to flooding, causing harm to people and property within urban areas. Likewise, these functions could be compromised by greater urban density and loss of GI. Both options propose to focus employment growth in the urban area on brownfield sites, although Option 2 may result in use of previously undeveloped land for the exported proportion of growth.
- 4.2.12 Fluvial flood risk is present in Dudley, particularly associated with the River Stour. Extents of surface water flood risk are found throughout the borough. New employment development and the introduction of new buildings and impermeable surfaces can exacerbate surface water flooding. It is possible to lessen these effects through development design and implementation of adaptive technologies such as SuDS but at this scale of assessment such detail is not known.
- 4.2.13 The overall impact of both options on climate change adaptation is uncertain, and would depend on the specific location of developments as well as the site-level design and incorporation of sustainable construction and technologies.

### **SA Objective 6 – Natural Resources**

- 4.2.14 The majority of the land within Dudley is classified as ALC 'urban' with a small pocket of 'non-agricultural' land in the north east of the borough and an area of Grade 3 land in the south. Small extents of Grade 2 land can be found in the south and north west of the borough. There are no MSAs in Dudley.
- 4.2.15 Both options propose to keep development to within the urban area, so no BMV agricultural land would be lost. Both options also aim to re-use brownfield land as much as possible, therefore both could have a minor positive impact on natural resources.
- 4.2.16 Option 2 intends for development to occur in the same locations as Option 1, however, it also seeks DtC contributions. Therefore, within Dudley, both options would lead to similar effects however Option 2 would lead to greater uncertainty as the location of potential DtC developments is unknown.

### **SA Objective 7 – Pollution**

- 4.2.17 Dudley has a borough wide AQMA; further development within this AQMA would likely increase pollution levels as vehicle numbers are likely to increase potentially further reducing air quality. Both options would focus employment development within the urban area, which may have negative impacts on air pollution. Option 2 would also direct a proportion of growth to neighbouring boroughs. This may increase vehicle movement, resulting in a negative impact on pollution, and depending on the location of exported growth may also be within or in close proximity to AQMAs across the Black County.

- 4.2.18 Effects on soil and water pollution would depend on the scale, nature and location of the developments which is not known for the spatial growth options. Additionally, there is potential for increases in pollution during the construction and occupation phases of development. The proposed end uses of employment sites under each option are not known, but this could include use of heavy goods vehicles (HGVs) and industrial processes, with implications for pollution. Consequently, a minor negative impact has been recorded for both options for pollution, although both would also include redevelopment of brownfield sites within the urban area which would allow for access to public transport infrastructure and may involve aspects of remediation for previous contamination.

### **SA Objective 8 – Waste**

- 4.2.19 Both spatial options do not provide sufficient information to be able to accurately predict the effect each option would have in terms of reducing waste generation, encouraging recycling or reuse of waste and promoting sustainable resource and waste management. However, it is expected that any new development would increase waste in both the construction and occupation phases. Employment growth may also result in a greater quantity or range of waste associated with more employment floorspace. Consequently, it is likely that both options would have a minor negative impact on waste. As Option 1 aims to keep development within Dudley, development may be situated in closer proximity to existing waste management infrastructure than Option 2 which includes some DtC exported growth, but at this stage any such details are unknown.

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

- 4.2.20 Dudley is well connected in relation to strategic transport routes, with a number of A and B roads that form the network connecting to the M5 that passes through the borough. The borough is also well connected through railway infrastructure providing links to surrounding areas such as Sandwell and Birmingham from stations in the north (Coseley) and the south (Stourbridge).
- 4.2.21 Whilst both options do not include specific details on transport or accessibility it is likely that they would increase vehicle movements within the borough to some extent, potentially also increasing congestion. Dudley is well served by public transport, but increased development may place additional strain on these services.
- 4.2.22 However, by focusing growth of employment sites within the urban area, it is likely that active travel will be encouraged for commuters, and site end users will be provided with good links to public transport. Overall, assuming there is sufficient capacity in the transport network to accommodate this growth, a minor positive impact on transport can be expected under both options.
- 4.2.23 As Option 1 will keep development within Dudley's urban area, potential access to public transport links for new development would be better compared to Option 2 which could see further development outside of DMBC and increased need to travel by car.

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### **SA Objective 10 – Housing**

- 4.2.24 Both options focus on employment growth only. It is assumed that the employment development would not result in the loss of existing housing, or compromise housing delivery. Therefore, both options would expect to have a negligible impact on housing provision within Dudley.

### **SA Objective 11 – Equality**

- 4.2.25 Options 1 and 2 propose growth within the existing urban area, with Option 2 providing potential for growth outside of Dudley through DtC. Both options would be likely to increase available jobs, potentially provide a wider range of job opportunities to residents and may attract a broader demographic of residents to Dudley which may have a positive effect on equality.
- 4.2.26 Overall, it is likely both options will have a minor positive impact on equality. Since Option 1 ensures any potential job opportunities will definitely arise within Dudley rather than neighbouring boroughs, it is likely this option would benefit Dudley's residents to a greater extent. Conversely, Option 2 could lead to the most benefits for equality and access to employment opportunities across the FEMA as a whole given it would deliver more employment growth than Option 1.

### **SA Objective 12 – Health**

- 4.2.27 Dudley's residents generally have good access to healthcare facilities and the majority of the urban area has good pedestrian and public transport access to these services. It is assumed that employment growth would not significantly affect the provision of or access to healthcare. Both options would focus growth on previously undeveloped land. Overall, a negligible impact on health would be likely.
- 4.2.28 It should be noted that there is potential for adverse effects on human health associated with poor air quality; these impacts have been addressed within SA Objective 7 (Pollution).

### **SA Objective 13 – Economy**

- 4.2.29 Option 1 proposes to deliver a large quantity of new employment land within the urban area, however, there is unlikely to be enough available land to meet the employment need under this option. Option 2 also aims to keep development within the existing urban area, however, if not enough land is available to meet the employment need, DMBC would need to rely on neighbouring authorities to help fill the shortfall through DtC. Therefore, Option 2 would be likely to result in a major positive impact on the economy through satisfying the identified need for employment land, whereas Option 1 would result in a shortfall and lead to a minor positive impact. Option 2 would be the best performing under this objective.

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

4.2.30 Employment Options 1 and 2 considered in this assessment focus on employment growth, which could potentially include opportunities for skill development and training, for example through the provision of internships, work experience and apprenticeships. Both options may therefore lead to an indirect minor positive impact on education (SA Objective 14). Option 2 may perform marginally better than Option 1 in this respect, since it would seek to meet all the employment land need whereas Option 1 would only meet the majority of the need.

## **4.3 Conclusions**

4.3.1 It is difficult to determine an overall best performing employment spatial growth option as both options are similar other than the fact Option 2 includes DtC contributions.

4.3.2 Option 1 could be seen as more suitable against some SA Objectives, for example biodiversity and landscape (SA Objectives 2 and 3), as it would have fewer uncertainties and gives DMBC full control over the location of employment development.

4.3.3 Option 2 places reliance on DtC to meet employment needs which could be difficult to achieve and may lead to development in less sustainable locations, with greater uncertainty in the performance against the environmentally focused SA Objectives. However, since Option 2 would be more likely to meet the identified employment land needs, and would ensure this is delivered within the wider FEMA, this option performs better against SA Objective 13 (economy), and would likely lead to more benefits in terms of equal access to employment opportunities as well as education, skills and training (SA Objectives 11 and 14).

4.3.4 As such, Option 2 would appear to be the better option overall as it would meet employment needs and deliver more social benefits, whereas the potential for adverse effects against environmentally focused SA Objectives are similar to Option 1.

## **4.4 Selection and Rejection**

4.4.1 Considering the SA findings alongside other evidence base information, DMBC have determined the following:

- Option 1 – rejected - would not sufficiently meet employment needs in the Borough.
- Option 2 – selected - would address employment need through a balanced spatial approach.

# 5 Assessment of Gypsy and Traveller Spatial Growth Options

## 5.1 Preface

- 5.1.1 In accordance with the Planning policy for traveller sites<sup>30</sup>, Gypsies and Travellers are defined as *“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such”*.
- 5.1.2 Travelling Showpeople are defined as *“Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above”*.
- 5.1.3 The Black Country Gypsy and Traveller Accommodation Assessment (GTAA) (2022)<sup>31</sup> assessed accommodation needs for Gypsies, Travellers and Travelling Showpeople across the DLP area and the wider Black Country.
- 5.1.4 Taking into consideration the updated Plan period for the DLP, the identified 5-year Gypsy and Traveller accommodation need for Dudley from 2021-41 is 46 pitches (for those who meet the ethnic definition) or 34 pitches (for those who meet the Planning Policy for Travellers 2015 definition). Currently, there are only 14 vacant pitches at existing sites, therefore, a significant extension of existing sites or DtC contribution will be required to meet the identified need.
- 5.1.5 DMBC have identified three spatial options for Gypsy and Traveller growth, as set out in **Table 5.1**. All three options would rely on windfall sites to meet identified needs and as such there is some uncertainty in terms of whether this could be achieved. All three options also reference existing pitch allocations. Carried forward Gypsy and Traveller sites have been assessed alongside other reasonable alternative development sites for the DLP in **Appendix C**.

<sup>30</sup> MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date accessed: 12/09/23]

<sup>31</sup> RRR Consultancy (2022) Black Country Gypsy and Traveller Accommodation Assessment. Final Report, April 2022.

**Table 5.1:** Dudley Gypsy and Traveller spatial growth options identified by DMBC

Gypsy and Traveller Option	Description of Gypsy and Traveller Spatial Growth Option
<b>Option 1: meeting as much of the need as possible in the Urban Area</b>	Under this option Dudley would look to carry forward existing pitch allocations from adopted Plans and safeguard any existing pitches which have secured planning consent since adopted Plans i.e. via windfalls.
<b>Option 2: meeting as much of the need as possible in the Urban Area, intensification, and expansion of existing facilities</b>	Under this option Dudley would look to carry forward existing pitch allocations from adopted Plans and safeguard any existing pitches which have secured planning consent since adopted Plans i.e. via windfalls. In addition, the Council will seek to identify opportunities to utilise additional capacity on existing sites or extend existing sites to increase pitch provision.
<b>Option 3: meeting all or the majority of needs in the Urban Area, intensification, and expansion of existing facilities, plus DtC. To be formulated for Reg 19 stage of the DLP.</b>	Option 3 would be as Option 2 above, but the Council would seek to work with DtC partners to identify whether there is scope to accommodate some of Dudley’s unmet needs.

5.1.6 Each option has been assessed for its likely sustainability impacts, a summary of which is presented in Table 5.2. Full explanations and reasonings behind each overall ‘score’ outlined in Table 5.2 are set out per SA Objective in the following sections of this appendix. Best performing options have been identified within each SA Objective.

**Table 5.2:** Impact matrix of the three Gypsy and Traveller spatial growth options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
G&T Spatial Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
1	0	0	-	+/-	-	0	-	+/-	+	+	+	+	+	+
2	+/-	+/-	-	+/-	-	+/-	-	+/-	+	+	+	+	+	+
3	+/-	+/-	-	+/-	-	+/-	-	+/-	+	++	++	+	+	+

## 5.2 Assessment

### SA Objective 1 – Cultural Heritage

5.2.1 Although Gypsy and Traveller sites are typically low-rise and small scale, there is potential for such developments to adversely affect the setting of heritage assets or the character of historic landscapes. Four out of six of Dudley’s existing allocated sites for Gypsy and Traveller use sit within an AHHLV.

- 5.2.2 Option 1 seeks to carry forward existing allocations and safeguard existing pitches, which would be likely to have a negligible impact on cultural heritage overall. Although some of the existing sites sit within land of potential cultural heritage value, they are relatively small sites and are likely to be able to accommodate growth up to their pitch capacity without significant adverse effects on cultural heritage.
- 5.2.3 Option 2 aims to utilise additional capacity on existing sites and seeks to extend some sites to increase pitch provision. The impacts of Option 2 are dependent on which sites would be chosen to extend, and the scale of such extensions. Utilising additional capacity on existing sites could have a negligible impact on cultural heritage, however, if any of the sites within AHHLVs are extended, a greater proportion of Dudley's historic landscape could be adversely affected.
- 5.2.4 The impacts of Option 3 are also uncertain as it mainly follows Option 2 with the addition of cooperation from DtC partners to help with any unmet needs. Without knowing the exact location of sites, the proposed extension of any existing sites, and the number of sites that would be sought after outside of the DLP area, it is not possible to accurately predict impacts on SA Objective 1.

### **SA Objective 2 – Landscape**

- 5.2.5 The existing Gypsy and Traveller sites at 'Holbeache Lane, Wall Heath' and 'Smithy Lane' are located within the Green Belt. The Smithy Lane site lies within an area classed as 'moderate-high' in the Landscape Sensitivity Assessment, although it should be noted that the study was designed to consider sensitivity of land parcels to housing and employment development (see paras 3.28-3.31 of the Landscape Sensitivity Assessment<sup>32</sup>), rather than Gypsy and Traveller pitches.
- 5.2.6 Option 1 would be expected to have a negligible impact on landscape as there will be very few alterations to existing sites and therefore the landscape will remain for the most part unchanged.
- 5.2.7 As Option 2 looks to utilise additional capacity, there is potential for sites within the Green Belt to be used, which could compromise the purposes of the Green Belt depending on the scale and nature of any expansions / intensifications. Option 2 has potential to negatively impact the landscape, although, if existing pitches within the urban area are expanded, impacts on landscape would likely be negligible. Therefore, as the sites that would be extended are not known, overall impacts on SA Objective 2 are uncertain.
- 5.2.8 The potential impact of Option 3 on landscape is uncertain since information on which sites could be expanded or how many sites would be supplied by DtC partners is unknown. Overall, Option 1 would be favourable as impacts on SA Objective 2 are most predictable and unlikely to be significant.

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<sup>32</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: 12/09/23]

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### **SA Objective 3 – Biodiversity, flora, fauna and geodiversity**

- 5.2.9 Of the existing Gypsy and Traveller sites in Dudley, several are located within proximity to biodiversity designations. The 'Oak Lane' site coincides with Oak Farm SLINC and is adjacent to Oak Farm SINC; 'Holbeache Lane' site coincides with Oak Farm SLINC; 'Smithy Lane' site coincides with Land off Chase Road SLINC; 'Dudley Road' site coincides with Stour Valley SLINC and 'Saltbrook Scrapyard' site is adjacent to Stour Valley SLINC.
- 5.2.10 Additional residents at these sites under any of the three spatial options will therefore have potential for a minor negative impact on biodiversity, by increasing development related threats and pressures.
- 5.2.11 Options 2 and 3 are less favourable than Option 1 given they both suggest expansion of the existing sites. Expansion of any of the existing sites could potentially reduce the extent and or quality of priority habitats. If any undeveloped land is utilised for the expansions, this could also lead to fragmentation of the ecological network, although it is acknowledged that this is likely to be small scale.
- 5.2.12 Depending on site-specific requirements including potential BNG requirements, adverse effects may be mitigated to some extent. At this stage of the assessment process, a minor negative impact on biodiversity cannot be ruled out for all three options.

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

- 5.2.13 The DLP area has good transport connections, with public transport being a viable option for travel and the majority of existing sites being well located with respect to many services and facilities to meet day to day needs. This may present positive effects with regard to climate change mitigation, by reducing the need to travel and facilitating more sustainable travel choices.
- 5.2.14 The majority of Dudley's CO<sub>2</sub> emissions are attributed to road transport sources, according to the government published estimates<sup>33</sup>; however, the proportion of this that can be attributed to Gypsies and Travellers is uncertain. Therefore, potential increases in carbon emissions as a result of the construction and occupation of Gypsy and Traveller pitches is uncertain.
- 5.2.15 Since Option 1 does not propose site expansions or DtC like Options 2 or 3, it could be assumed that this option would have reduced potential for adverse effects within Dudley Borough in terms of climate change mitigation, although there is likely to be little difference between the options.

### **SA Objective 5 – Climate Change Adaptation**

- 5.2.16 Four of the six existing sites are at risk of fluvial flooding (two in Flood Zone 3a, one completely and one partially in Flood Zone 3b) and the site at 'Dudley Road, Lye' coincides with some areas of high surface water flood risk.

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<sup>33</sup> Dudley MBC (2011) Air Quality Action Plan Dudley MBC. Available at: <https://aqma.defra.gov.uk/action-plans/DMBC%20AQAP%202011.pdf> [Date accessed: 31/07/23]



5.2.17 Options 1 and 2 both support development within these existing sites and therefore support development in areas at relatively high risk of flooding, including expanding/intensifying sites which could potentially lead to a minor negative impact on climate change adaptation, assuming this would involve creation of new impermeable surfaces and loss of undeveloped land / GI to some degree. Option 3 also promotes development within these sites but will also seek DtC contributions and could provide some sites or pitches within neighbouring boroughs. Therefore, Option 3 would be preferable in this case to supply enough pitches and avoid intensifying negative impacts as much as possible within Dudley, assuming that areas of flood risk outside the borough could be avoided.

### **SA Objective 6 – Natural Resources**

5.2.18 Three of the existing sites are situated on land classified as 'urban' and three are 'non-agricultural' according to the ALC, and so development under all three growth options will be unlikely to affect BMV agricultural land. Whilst intensification under Options 2 or 3 would represent an efficient use of land and help to reduce overall land-take for development, both would also seek to expand existing sites and therefore could result in some small-scale loss of previously undeveloped land, with potential for negative effects on natural resources.

5.2.19 Overall, Option 1 is preferable as developing within the existing sites would have a negligible impact on soil resources. Options 2 and 3 have potential to have negligible impacts on natural resources if only intensification of sites takes place. However, if under Options 2 and 3 sites are expanded significantly, it could lead to small-scale adverse effects with regard to the loss of soil to some extent. The impact for Options 2 and 3 is therefore uncertain.

### **SA Objective 7 – Pollution**

5.2.20 The entirety of the DLP area falls within Dudley AQMA, meaning that development under any of the options would be likely to expose new residents to poor air quality, and would introduce new development in the AQMA.

5.2.21 Additionally, new development may also lead to increased soil and water pollution, as a result of construction and occupation of the development. This will depend on the nature and scale of the proposed Gypsy and Traveller pitches, such as the extent of new hardstanding, and any utilities infrastructure that is introduced.

5.2.22 Overall, all three Gypsy and Traveller growth options would be expected to expose new residents to pollution and may generate further pollution to some degree. A minor negative impact would be expected as a result of all options.

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### **SA Objective 8 – Waste**

- 5.2.23 It is assumed that new residents in the DLP area will have an annual waste production of approximately 399kg per person, in line with the average for England<sup>34</sup>. Waste may also be produced during the expansion of the sites.
- 5.2.24 There is a degree of uncertainty in this assessment, as it is unknown how the average waste production from a Gypsy and Traveller household compares to that of a 'brick and mortar' dwelling, although it is likely that all options for Gypsy and Traveller growth would increase household waste production, to some extent.
- 5.2.25 As Option 1 does not propose site expansions or DtC like Options 2 or 3, it could be assumed that this option would have less potential for adverse effects in terms of waste generation within Dudley Borough. Overall, the impact of all options is uncertain.

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

- 5.2.26 The existing sites at 'Dudley Road', 'Delph Lane' and 'Saltbrook Scrapyard' are all within the sustainable target distance of 1.5km of Lye Station. Four of the sites are within 15 minutes walking distance of fresh food and services; all sites are within 10 minutes of fresh food and services by public transport. However, none of the existing sites are within 600m of a Public Right of Way (PRoW) or Dudley's cycle network and 'Oak Lane' and 'Holbeache Lane' are not within 400m of a bus stop.
- 5.2.27 Development under all three options would be likely to provide relatively good access to sustainable travel options and may serve to encourage some local journeys via active travel, owing to the location of sites with respect to existing facilities and employment opportunities. A minor positive impact could be expected under all three options with regard to transport and accessibility.
- 5.2.28 Overall, Option 2 could be seen as the most preferable as it looks to utilise additional pitch capacity or extend existing sites, therefore, would be likely to ensure the majority of new residents are located in areas with existing relatively good accessibility within Dudley. The impact of Option 3 would be very similar to Option 2 within Dudley itself although it is less certain overall as some sites may be located outside of the DLP area where accessibility is unknown.

### **SA Objective 10 – Housing**

- 5.2.29 All three options seek to contribute towards meeting the identified Gypsy and Traveller pitch requirements for Dudley and would therefore be expected to result in a positive impact on housing provision.

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<sup>34</sup> DEFRA (2021) Statistics on waste managed by local authorities in England in 2020/21. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1040756/Statistics\\_on\\_waste\\_managed\\_by\\_local\\_authorities\\_in\\_England\\_in\\_2020\\_v2rev\\_accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040756/Statistics_on_waste_managed_by_local_authorities_in_England_in_2020_v2rev_accessible.pdf) [Date accessed: 12/09/23]

5.2.30 Option 2 would be likely to deliver higher quality accommodation if as it has a wider range of options available than Option 1 and may have greater certainty in delivery as it does not rely only on windfall sites to meet needs. Option 2 also considers identifying additional capacity on existing sites through intensification or expansion. However, both Options 1 and 2 would be unlikely to fully satisfy the identified accommodation needs, resulting in a minor positive impact.

5.2.31 Option 3 would be most likely to ensure Dudley's Gypsy and Traveller accommodation needs are met through the same means as Option 2 plus DtC partner contributions, leading to a major positive impact. Furthermore, in the case of Gypsies and Travellers, meeting some of the accommodation need outside of the DLP area is not necessarily a negative, given their travelling lifestyle.

### **SA Objective 11 – Equality**

5.2.32 Race is a protected characteristic under the Equality Act. The growth options seek to contribute towards the identified accommodation requirements for Gypsies and Travellers which would be likely to have a positive impact on meeting the accommodation needs of this ethnic group. All proposed Gypsy and Traveller growth options could also result in positive effects on equality in terms of helping to facilitate social inclusion and ensuring that the development is situated in areas with good connectivity to local services, facilities and employment opportunities.

5.2.33 Overall, all three options would help to meet the needs of the Gypsy and Traveller population and support community cohesion. Options 1 and 2 would be expected to have a minor positive impact on equality. Option 3 would likely have the most significant positive impact as it aims to grow existing sites to meet the needs of the Dudley's Gypsies and Travellers to the greatest extent, leading to a major positive impact on equality.

### **SA Objective 12 – Health**

5.2.34 Four of the existing sites are located within a sustainable distance to healthcare facilities, including within a 15-minute walking distance to a GP surgery. All of the existing sites are within the 5km sustainable target distance of Russells Hall Hospital. The proposed development under Options 1 and 2 would be likely to facilitate good access to healthcare.

5.2.35 There are a range of public open spaces in proximity to all of the existing sites; open spaces are fairly well distributed across the borough. All three options would be expected to provide new residents with access to outdoor space for exercise and recreation, with associated positive effects on health and wellbeing.

5.2.36 Overall, the proposed development at all options could result in a minor positive impact in terms of access to healthcare and recreational facilities. However, under Option 3, some of the new Gypsy and Traveller pitches will be located outside of Dudley and so impacts on health are somewhat uncertain.

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### **SA Objective 13 – Economy**

- 5.2.37 All existing Gypsy and Traveller sites are located in areas with good sustainable access to employment, as is the case for the majority of the borough. According to accessibility modelling data, all sites are located within a 20 to 30-minute walk and public transport journey to an employment location.
- 5.2.38 The development proposed under Options 1 and 2 would be likely to ensure that the Gypsy and Traveller community would have better sustainable access to employment opportunities than Option 3, since under Option 3 some of these developments may take place outside of Dudley where sustainable accessibility to employment opportunities is less certain. Overall, all options have potential to result in a minor positive impact on SA Objective 13.

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

- 5.2.39 All of the existing Gypsy and Traveller sites in Dudley are located in areas with good sustainable access via public transport to secondary schools, although some fall outside of the sustainable walking distance to primary and secondary schools.
- 5.2.40 The development proposed under Options 1 and 2 could potentially ensure that the Gypsy and Traveller community would have better sustainable access to education, skills and training than Option 3, since under Option 3 some of these pitches come from DtC contributions, the specific location of which is unknown. Overall, all options have potential to result in a minor positive impact on SA Objective 14.

## **5.3 Conclusions**

- 5.3.1 Options 1, 2 and 3 perform similarly overall as shown in **Table 5.2**. All three proposed options for Gypsy and Traveller growth would be expected to make significant contributions towards meeting the identified need of 46 additional pitches by 2041 but each spatial option differs slightly with regard to the distribution of growth.
- 5.3.2 Options 1, 2 and 3 would locate new residents in central areas where there is generally good access to transport infrastructure, healthcare, jobs and schools, leading to positive impacts against SA Objectives 9, 12, 13 and 14.
- 5.3.3 On the other hand, all options could also give rise to some potential adverse effects, for example, added threats and pressures to local biodiversity designations and increased pressure for development in areas at risk of surface water and fluvial flooding (SA Objectives 3 and 5).
- 5.3.4 There is some uncertainty regarding the effects of the proposed development on cultural heritage, landscape, climate change mitigation, natural resources and waste (SA Objectives 1, 2, 4, 6 and 8), owing to uncertainty in the scale and nature of development involved.

5.3.5 Option 1 does not suggest any site expansion; therefore, it is unlikely that this option will be able to fully meet Dudley's Gypsy and Traveller accommodation needs. Option 2 would make a greater contribution towards meeting the needs of the Gypsy and Traveller communities within Dudley than Option 1, and proposes similar intensification / expansion of sites to Option 3. If carefully managed, with consideration of local constraints adjacent or near to the existing sites, extending existing sites and adding capacity for both Options 2 and 3 could be achieved with minimal negative impacts.

5.3.6 Option 3 would be the most likely to wholly meet the identified accommodation needs owing to the proposed DtC contributions and performs the best against SA Objectives 10 (housing) and 11 (equality). Without knowing the contribution from DtC partners for site provisions, the full extent of potential impacts are somewhat uncertain. However, overall, Option 3 could be seen as the best performing option because it would be most likely to meet the identified needs and deliver social benefits, whereas the potential for adverse effects against environmentally focused SA Objectives are similar to Option 2.

## 5.4 Selection and Rejection

5.4.1 Considering the SA findings alongside other evidence base information, DMBC have determined the following:

- Option 1 – rejected - would not sufficiently meet G&T needs in the Borough.
- Option 2 - rejected - would not sufficiently meet G&T needs in the Borough.
- Option 3 – selected – would address G&T need through a balanced spatial approach.

## 6 Assessment of policies

### 6.1 Preface

- 6.1.1 The DLP will contain strategic and non-strategic planning policies and land allocations to support the growth and regeneration of Dudley up to 2041. The Draft DLP Consultation (Regulation 18) document presents information relating to proposed policy areas for inclusion in the emerging DLP.
- 6.1.2 Many policies are derived from the ceased 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.
- 6.1.3 DMBC have considered the extent to which each of the 63 draft BCP policies remains relevant and applicable to the DLP area, in light of consultation responses received during the BCP Regulation 18 consultation, and the smaller geographic area considered within the DLP compared to the former BCP. DMBC have also reviewed and updated other existing policies for the area and brought these forward for the DLP; this includes policies from the Dudley, Stourbridge and Halesowen AAPs.
- 6.1.4 A total of 143 policies have been prepared for the Draft DLP. 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 of the policies as presented within the DLP Part 1 (Spatial Strategy and Policies) are set out in full within **Appendix D**. The assessments of the policies as presented within the DLP Part 2 (Allocations and Centres) are set out in full within **Appendix E**. This chapter summarises the results of these assessments.
- 6.1.5 For ease of reference, a summary of the scoring system used to present likely impacts of each proposed DLP policy is presented below in **Box 6.1**.

**Box 6.1: Scoring system for policy assessments**

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed policy contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed policy contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed policy has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed policy has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed policy prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed policy prevents the achievement of the SA Objective to a significant extent.	--

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## 6.2 Overview of Policy Assessments

- 6.2.1 The impact matrix for all policy assessments is presented in **Table 6.1**. These impacts should be read in conjunction with the assessment text narratives in **Appendix D** and **E**, as well as the topic-specific methodologies and assumptions presented in **Appendix B** for policies that relate to allocations.
- 6.2.2 The proposed policies to be included within the DLP would be anticipated to help ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the DLP are avoided, mitigated or subject to compensatory measures wherever possible. These will also provide development proposals with relevant supporting information to ensure that the impacts of development can be appropriately factored into land use decision-making processes.
- 6.2.3 The DLP is presented in two documents: Part 1 contains 89 policies associated with the following themes:
- Development strategy;
  - Infrastructure;
  - Health and wellbeing;
  - Housing;
  - Employment;
  - Centres and town centre uses;
  - Environment;
  - Climate change;
  - The borough's green infrastructure;
  - Historic environment;
  - Recreation and community uses;
  - Transport;
  - Waste;
  - Minerals; and
  - Development management.
- 6.2.4 Part 2 of the DLP includes 54 policies relating to centres of Brierley Hill, Dudley, Stourbridge and Halesowen, including site allocation policies for Opportunity Sites and Priority Sites, and one Local Green Space, for the DLP.
- 6.2.5 The impact matrix tables for all policy assessments are presented in **Table 6.1**. The identified impacts should be read in conjunction with the assessment text narratives that are presented within **Appendix D** and **E**.
- 6.2.6 For the majority of 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; for example, where the policies incorporate conservation and enhancement of heritage assets (SA Objective 1), measures to mitigate flooding (SA Objective 4) or improve include measures that could potentially improve the surrounding landscape (SA Objective 2), naming a few of those found within the policies.

- 6.2.7 A greater range of sustainability effects is identified for policies that have potential to introduce new development, for example, the housing and economy policies, as well as the site allocation policies. As such, uncertain impacts have been identified for some SA Objectives as a result of some of the policies in these sections. The range in potential impacts for these policies owes to the fact that large developments could have major negative impacts when considered without mitigation, however, 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.
- 6.2.8 Some policies, such as the development strategy policies, set out the broad direction for growth. As such, minor negative impacts have been identified for certain SA Objectives as a result of some policies in these sections, owing to the potential for the large amount of proposed development to lead to increases in pollution and waste, for example.
- 6.2.9 Opportunities for enhancement may also be secured through policies in the DLP. Where there are opportunities to improve the sustainability performance of draft policies these have been identified in SA process (see **Chapter 8**).

**Table 6.1: 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
DLP1	+/-	+/-	+/-	+	0	+	-	-	+	++	0	+	++	0
DLP2	+/-	+	0	+	0	+	+	-	+	++	+	+	++	+
DLP3	+/-	+	+	+/-	+	+	+/-	-	+	+	+	0	+	0
DLP4	+	++	0	+	+	0	+	0	+	0	+	+	0	0
DLP5	+	+	0	+	0	0	+	0	+	0	+	+	+	0
DLP6	0	0	+	+	+	0	+	0	+	+	+	+	0	0
DLP7	0	0	0	+	0	0	+	0	+	0	+	0	+	0
DLP8	0	0	0	0	0	0	0	0	0	0	+	++	0	0
DLP9	0	0	0	+	0	0	+	0	+	0	+	++	0	0
DLP10	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-
DLP11	0	0	0	+	0	0	+	0	+	+	+	0	0	0
DLP12	0	0	0	0	0	0	0	0	0	+	+	+	0	0
DLP13	0	+	0	0	0	0	0	0	+	+	+	+	0	0
DLP14	0	+	0	0	0	+	0	0	0	0	0	0	0	0
DLP15	+/-	0	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+
DLP16	0	0	0	+	0	0	+	0	+	0	+	+	+	++
DLP17	0	0	0	0	0	0	0	0	+	+	+	+	0	0
DLP18	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-
DLP19	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-
DLP20	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-
DLP21	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-
DLP22	0	0	0	0	0	0	+	0	0	+	0	0	+	0



	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP23	0	0	0	0	0	0	0	0	+	0	+	+	+	+
DLP24	+/-	+	+/-	+	+	+	+	0	+	+	+	+	+	0
DLP25	0	0	0	+	0	0	0	0	+	0	+	+	+	0
DLP26	0	0	0	+	0	0	0	0	+	0	+	+	+	0
DLP27	0	0	0	+	0	0	+	0	+	0	+	+	+	0
DLP28	0	0	0	0	0	+	0	0	+	+	0	+	0	0
DLP29	0	0	0	0	0	0	0	0	0	0	+	+	0	0
DLP30	0	+	0	0	0	0	0	0	0	0	0	0	+	0
DLP31	0	+	++	+	+	0	+	0	0	0	+	+	0	0
DLP32	0	+	++	+	+	0	+	0	0	0	+	+	0	0
DLP33	+	+	++	+	+	0	0	0	0	0	0	+	0	0
DLP34	0	+	+	0	0	0	0	0	0	0	0	+	0	0
DLP35	+	+	+	0	0	0	0	0	0	0	0	0	+	+
DLP36	+	+	+	0	0	0	+	0	+	+	0	+	+	0
DLP37	+	+	+	+	+	0	+	0	+	0	+	+	0	0
DLP38	0	+	0	0	0	0	0	0	+	0	+	+	0	0
DLP39	+	+	+	+	+	+	+	0	+	0	+	+	0	0
DLP40	0	++	++	0	++	0	0	0	0	0	0	+	0	0
DLP41	+	+	+	++	+	+	+	+	0	+	0	+	0	0
DLP42	0	0	0	+	+	0	+	0	0	0	0	+	0	0
DLP43	0	0	+	+	+	0	+	0	0	0	0	0	0	0
DLP44	0	0	+	+	0	0	++	0	+	0	0	+	+	0
DLP45	0	0	+	0	++	0	+	0	0	0	0	+	0	0
DLP46	0	0	+	0	+	0	0	0	0	0	0	0	0	0
DLP47	0	0	0	+	0	0	+	0	0	0	+	+	0	0
DLP48	0	0	0	0	0	+	+	0	0	0	0	0	0	0
DLP49	0	+	0	0	0	+	0	0	0	0	0	+	0	0
DLP50	0	0	0	0	0	0	0	0	0	+	0	0	+	0
DLP51	0	+	+	+	+	0	+	0	+	0	0	+	+	0
DLP52	0	+	+	0	0	0	0	0	0	0	0	0	0	0
DLP53	+	+	+	0	0	0	0	0	+	0	+	+	0	0
DLP54	0	+	+	0	+	0	+	0	+	0	0	+	0	0
DLP55	++	++	+	0	0	0	0	0	0	0	0	0	+	0
DLP56	+	+	+	0	0	0	0	0	0	0	0	0	0	0
DLP57	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLP58	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLP59	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLP60	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLP61	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLP62	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLP63	0	+	+	0	0	0	0	0	0	0	0	+	+	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP64	0	0	0	0	0	0	0	0	0	0	+	+	0	0
DLP65	0	0	+	0	0	0	0	0	0	0	+	+	0	0
DLP66	0	+	0	0	0	0	0	0	0	0	+	0	0	0
DLP67	0	0	0	+	0	0	+	0	++	0	+	+	0	0
DLP68	0	0	0	0	0	0	0	0	+	0	0	0	0	0
DLP69	0	0	0	+	0	0	0	0	+	0	0	0	0	0
DLP70	0	0	-	0	0	0	0	0	+	0	0	0	+	0
DLP71	0	0	0	+	0	0	+	0	++	0	+	+	0	0
DLP72	0	0	0	+	0	0	+	0	+	0	0	0	0	0
DLP73	0	0	0	+	0	0	+	0	+	0	0	0	0	0
DLP74	0	0	0	+	0	0	+	0	+	0	0	+	0	0
DLP75	0	0	0	0	0	0	0	++	0	0	0	0	0	0
DLP76	0	0	0	0	0	0	0	+	0	0	0	0	0	0
DLP77	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
DLP78	0	0	0	0	0	0	0	+	0	0	0	0	+	0
DLP79	0	0	0	0	0	+	0	++	0	0	0	0	0	0
DLP80	0	0	0	0	0	+	0	+	0	0	0	0	+	0
DLP81	0	0	0	0	0	+	0	0	0	0	0	0	0	0
DLP82	0	0	0	0	0	+	0	0	0	0	0	0	0	0
DLP83	0	0	0	+	0	0	+	0	+	0	+	+	0	0
DLP84	0	0	+	0	0	0	+	0	0	0	0	+	0	0
DLP85	0	0	0	0	0	+	+	0	0	0	0	+	0	0
DLP86	0	0	+	0	0	+	0	0	0	0	0	0	0	0
DLP87	0	0	0	0	0	0	+	0	0	0	0	+	0	0
DLP88	+	+	+	0	0	0	+	0	0	0	0	+	0	0
DLP89	0	+	0	0	0	0	0	0	0	0	0	+	0	0
DLPBH1	0	0	0	+	0	0	0	0	+	0	0	+	+	0
DLPBH2	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPBH3	0	+	+	0	0	0	0	0	+	0	+	+	0	0
DLPBH4	0	+	++	+	+	0	+	0	0	0	0	+	0	0
DLPBH5	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPBH6	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPBH7	0	0	0	+	0	0	+	0	++	0	0	+	+	0
DLPBH8	0	0	0	+/-	+/-	+/-	+/-	+/-	++	++	+	+	+	+
DLPBH9	0	0	0	0	0	0	0	0	0	0	0	0	+	+
DLPBHPS1	+	+	+	-	-	-	-	-	++	++	0	+	++	0
DLPBHPS2	+	+	0	0	-	-	-	-	++	++	+	++	++	++
DLPBHOS1	-	0	+	+/-	-	-	-	+/-	0	0	0	++	+/-	+
DLPBHOS2	-	0	-	+/-	-	-	-	+/-	0	0	0	0	+/-	0
DLPBHOS3	-	0	+	+/-	-	-	-	+/-	0	+	+	++	+/-	++
DLPD1	0	+	0	0	0	+	0	0	0	+	+	+	++	+

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPD2	0	0	0	0	0	0	0	0	0	0	0	+	+	0
DLPD3	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPD4	+	+	+	0	+	0	+	0	+	0	0	+	0	0
DLPD5	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPD6	+	++	0	0	0	+	0	0	0	0	0	0	0	0
DLPD7	++	++	+	0	0	0	0	0	+	0	0	0	+	0
DLPD8	0	0	0	+	0	0	+	0	++	0	0	+	0	0
DLPDPS1	+	+	+	0	0	+	-	0	++	++	0	+	+	++
DLPDPS2	+	+	0	-	0	-	-	-	++	++	0	++	+/-	++
DLPDOS1	-	0	+	+/-	+	+	-	+/-	+	0	+	++	+	++
DLPDOS2	-	0	+	0	-	+	-	0	0	+	0	++	+/-	++
DLPDOS3	-	0	+	0	0	+	-	0	+	+	0	++	+/-	++
DLPDOS4	0	0	+	0	+	+	-	0	+	+	0	++	+/-	++
DLPS1	0	0	0	+	0	+	0	0	+	0	+	+	+	0
DLPS2	0	+	+	0	0	0	0	0	+	0	0	0	+	0
DLPS3	+	+	0	0	0	0	0	0	0	0	0	0	+	0
DLPS4	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPS5	0	+	+	0	0	0	0	0	+	0	0	+	+	0
DLPS6	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPS7	0	+	+	0	0	0	0	0	0	0	0	+	0	0
DLPS8	0	0	0	+	0	0	0	0	+	0	+	+	+	0
DLPSOS1	-	0	0	0	-	-	-	0	++	+	+	-	+/-	++
DLPSOS2	-	0	-	+/-	--	-	-	+/-	++	0	+	+	+	0
DLPSOS3	-	0	+	0	+	+	-	0	++	+	+	-	+/-	++
DLPH1	0	0	0	+	0	+	0	0	+	0	+	+	+	0
DLPH2	0	0	0	0	0	+	0	0	+	0	0	0	0	+
DLPH3	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPH4	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPH5	0	+	+	0	0	0	0	0	+	0	+	+	0	0
DLPH6	+	+	+	0	0	+	0	0	0	0	+	+	0	0
DLPH7	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPH8	0	+	0	0	0	0	0	0	++	0	+	+	0	0
DLPHOS1	-	0	-	0	-	+	-	0	0	+	+	-	+/-	++
DLPHOS2	-	0	-	0	--	-	-	0	0	+	+	-	+/-	++
DLPHOS3	-	0	-	0	-	+	-	0	0	+	+	-	+/-	++
DLPHOS4	-	0	-	0	-	+	-	0	0	+	+	-	+/-	++
DLPHOS5	0	+	+	0	+	+	-	0	0	+	+	-	++	++
DLPKQH1	0	-	+/-	+	0	-	-	-	+	++	+	+	+	+
DLPLGS1	0	0	+	0	0	+	0	0	0	0	0	+	0	0

# 7 Assessment of reasonable alternative development sites

## 7.1 Preface

7.1.1 The Black Country Call for Sites request first opened in July 2017 and re-opened from 9<sup>th</sup> July – 20<sup>th</sup> August 2020<sup>35</sup> as part of the former draft BCP preparation. DMBC have carried out annual Strategic Housing Land Availability Assessments (SHLAAs) of sites within which have the potential to accommodate new housing development. DMBC recently called for sites in February 2023 to inform the DLP, inviting submission of new sites which were not previously submitted as part of the BCP Call for Sites process.

7.1.2 In accordance with the preferred spatial strategy of the DLP, only the urban area of the borough has been explored for potential development sites with a focus on brownfield land first. A threshold of 10 homes and/or a gross site area of 0.25ha has generally been used for sites without planning permission and a threshold of 50 homes for sites with planning permission.

7.1.3 DMBC have reviewed all sites received through the CFS process, and rejected those which:

- Do not meet the minimum size/capacity threshold;
- Have been withdrawn by the landowner; or
- Have a 'gateway constraint' e.g. Flood Zone 3 or national environmental designations such as SACs and SSSIs (see the DMBC Site Assessment Methodology Report (2023) for a full list of gateway constraints considered).

7.1.4 This filtering process has been used to identify reasonable alternatives for assessment in the SA. Identification of a site as a reasonable alternative does not imply that the site is not subject to other constraints. Further potential constraints are assessed as part of the SA and plan making process for identified reasonable alternatives, using available evidence derived from publicly accessible data sources and information supplied by the Council.

7.1.5 A total of 211 reasonable alternative sites have been identified by DMBC. This includes 138 sites proposed for residential use, 21 sites proposed for Gypsy, Traveller and Travelling Showpeople (GTTS) use, 34 sites proposed for employment use and 18 sites proposed for mixed-use (of which four are non-residential mixed uses, and 14 include some residential development).

## 7.2 Overview of Site Assessments (Pre-Mitigation)

7.2.1 **Chapter 2** sets out the methodology used to appraise the reasonable alternative sites in the SA process, and topic-specific methodologies set out in **Appendix B** explains how the likely impact per receptor has been identified in line with the local context and assumptions.

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<sup>35</sup> Available at <https://blackcountryplan.dudley.gov.uk/t2/p3/> [Date accessed: 30/06/23]

- 7.2.2 The assessment of the 211 reasonable alternative sites, including rationale for the recorded impacts, is presented in full in **Appendix C**.
- 7.2.3 A summary of the impact matrices for all reasonable alternative site assessments pre-mitigation is presented in **Table 7.1**. These impacts should be read in conjunction with the assessment text narratives in **Appendix C** as well as the topic specific methodologies and assumptions presented in **Appendix B**.
- 7.2.4 It should be noted that the site assessments include an overall impact symbol, summarised in **Table 2.4**, for each of the 14 SA Objectives. Whereas **Appendix C** documents likely impacts on receptors within each SA Objective, which have been included to provide the reader with contextual information that is relevant to each SA Objective. The overall impact symbol in **Table 7.1** below for each SA Objective is always represented by the lowest common denominator. It may be possible that positive or negligible receptor impacts are relevant to an SA Objective, however, if one of the receptor impacts is identified as a major negative impact, the SA Objective will be identified as major negative overall. Please refer to **Appendix C** for the full breakdown of identified effects for each SA Objective.
- 7.2.5 Each appraisal includes a SA impact matrix which provides an indication of the nature and magnitude of impacts pre-mitigation. All assessment information excludes consideration of detailed mitigation i.e., additional detail or modification to the reasonable alternative that has been introduced specifically to reduce identified environmental effects of that site. Presenting assessment findings 'pre-mitigation' facilitates transparency to the decision makers.
- 7.2.6 The appraisal of the 211 reasonable alternative sites demonstrated that all development proposals would be likely to result in a range of sustainability impacts as shown in **Table 7.1**.
- 7.2.7 Dudley is predominantly urban, accompanied with proportions of greenspace dispersed throughout the borough and therefore, the SA identified a range of positive and adverse potential impacts of the reasonable alternative sites on the objectives within the SA framework.
- 7.2.8 Negative impacts were mainly related to issues associated with air quality due to the proximity of the new sites to the borough's major roads and the proposed developments impact on the borough's carbon footprint; access to the railway network, coinciding with SWFR, sites located in deprived areas, access to NHS Hospitals and potential losses in employment floorspace.
- 7.2.9 Positive impacts were identified in relation to the provision of new housing floorspace, benefits to health and accessibility as many sites are located within sustainable distance to public green spaces; accessibility to schools and access to local bus services; and coinciding with Flood Zone 1 where fluvial flood risk is low.

**Table 7.1:** *Summary impact matrix of all reasonable alternative sites*

Site Reference	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
DLP BH H001	--	+/-	+/-	-	-	-	-	0	-	+	0	++	-	++
DLP BH H002	-	+/-	+/-	0	+	+	-	0	-	+	-	++	++	-
DLP BH H003	-	+/-	-	-	--	-	--	-	-	++	0	++	--	++
DLP BH H004	0	+/-	-	0	+	+	-	0	-	+	0	++	--	-
DLP BH H008	-	+/-	-	0	+	+	-	0	-	+	-	++	-	-
DLP BH H009	-	+/-	+/-	0	+	+	-	0	-	+	0	++	-	++
DLP BH H010	-	+/-	+/-	0	+	-	--	0	-	++	0	++	-	++
DLP BHPS1	0	+/-	+/-	-	--	-	--	-	-	++	-	-	++	-
DLP BHPS2	-	+/-	-	-	--	-	--	-	-	++	0	++	++	++
DLP D H2 /DLP D H3/DLP D H4	-	+/-	+/-	0	--	+	-	0	-	+	-	++	--	++
DLP DH1	-	+/-	+/-	0	+	+	-	0	-	+	-	++	++	++
DLP DH5	--	+/-	+/-	0	+	+	-	0	-	+	-	++	-	++
DLP DH6	-	+/-	+/-	0	--	+	-	0	-	+	-	++	++	++
DLP DH7	0	+/-	+/-	0	--	+	-	0	+	+	0	++	-	-
DLP DH8	-	+/-	+/-	0	+	-	-	0	-	+	-	++	++	++
DLP DH9	0	+/-	+/-	0	+	+	-	0	-	+	-	++	-	++
DLP HH1	-	+/-	+/-	0	-	+	-	0	-	+	-	-	-	++
DLP HH2	-	+/-	-	0	-	+	-	0	-	+	0	-	-	++
DLP SH1	-	+/-	+/-	0	+	-	-	0	++	+	0	-	++	++
DLP SH2	-	+/-	-	0	--	-	-	0	++	+	0	-	-	++
DLP SH3	--	+/-	-	0	--	+	-	0	++	+	0	-	-	-
DLP SH4	-	+/-	+/-	0	--	+	-	0	++	+	0	-	-	++
DLP SH5	-	+/-	+/-	0	--	+	-	0	++	+	0	-	-	++
DLP SH6	-	+/-	-	0	-	+	-	0	++	+	0	-	-	++
DLP SH7	-	+/-	+/-	0	+	-	-	0	++	+	0	-	++	++
DLPH001	-	+/-	-	0	-	-	-	0	-	+	0	+	++	++
DLPH002	-	+/-	-	-	-	-	--	-	+	++	0	-	++	+
DLPH003	0	+/-	+/-	0	+	-	-	0	++	+	0	-	++	++
DLPH004	-	+/-	-	-	--	-	--	-	-	++	-	++	++	++
DLPH005	-	+/-	+/-	0	-	-	-	0	++	+	-	-	++	++
DLPH006	0	+/-	+/-	0	+	-	-	0	-	+	0	++	++	++
DLPH007	0	+/-	-	0	--	-	-	0	+	+	0	++	+	++
DLPH008	0	+/-	-	0	-	+	-	0	-	+	0	-	++	-
DLPH009	-	+/-	+/-	0	+	+	-	0	++	+	0	-	-	++
DLPH010	-	+/-	-	0	-	+	-	0	-	+	0	++	-	++
DLPH011	-	+/-	-	0	+	-	-	0	-	+	-	-	--	++
DLPH012	0	+/-	+/-	0	-	+	-	0	++	+	0	-	-	++
DLPH013	0	+/-	-	0	+	-	-	0	+	+	0	-	-	-
DLPH014	0	+/-	+/-	0	+	+	-	0	++	+	0	-	-	++
DLPH015/DLPH026	-	+/-	-	0	--	+	-	0	++	+	0	++	-	-

Site Reference	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
DLPH016	-	+/-	-	0	-	-	-	0	++	+	0	++	-	++
DLPH017	0	+/-	+/-	0	--	-	--	-	++	++	0	++	--	-
DLPH018	0	+/-	+/-	0	-	-	-	0	-	+	0	++	++	++
DLPH019	-	+/-	+/-	0	-	-	-	0	++	+	0	-	-	++
DLPH020	0	+/-	+/-	0	+	-	-	0	-	+	-	++	-	++
DLPH021	0	+/-	+/-	0	+	-	-	0	-	+	0	-	++	-
DLPH022	-	+/-	--	0	--	-	--	0	-	++	0	++	-	++
DLPH023	-	+/-	-	0	-	+	-	0	++	+	0	++	-	++
DLPH024	-	+/-	+/-	0	-	+	-	0	++	+	0	++	--	-
DLPH025	-	+/-	+/-	0	-	-	-	0	-	+	-	++	++	++
DLPH027	-	+/-	-	0	-	-	-	0	+	+	0	++	++	-
DLPH028	-	+/-	--	0	+	-	-	0	++	+	0	-	++	++
DLPH029	-	+/-	+/-	0	+	-	-	0	++	+	0	-	++	-
DLPH030	0	+/-	-	-	-	-	--	-	-	++	0	-	-	-
DLPH031	-	+/-	-	-	-	-	--	-	++	++	-	++	++	-
DLPH032	0	+/-	+/-	0	--	+	--	0	-	++	-	++	--	++
DLPH033	-	+/-	+/-	0	-	+	--	0	-	+	0	++	--	+
DLPH034	-	+/-	-	0	-	+	-	0	++	++	-	+	--	++
DLPH035	-	+/-	-	0	+	+	-	0	-	+	0	-	-	-
DLPH036	-	+/-	-	0	-	+	-	0	-	+	0	++	--	++
DLPH037	0	+/-	-	0	-	-	-	0	++	+	0	++	+	++
DLPH038	0	+/-	+/-	0	--	-	-	0	-	+	0	-	++	-
DLPH039	0	+/-	+/-	0	+	-	-	0	++	+	0	-	++	-
DLPH040	0	+/-	+/-	0	-	-	-	0	-	+	0	-	++	-
DLPH041	0	+/-	+/-	0	+	+	-	0	-	+	0	++	-	++
DLPH042	0	+/-	-	0	--	-	-	0	++	+	0	-	++	++
DLPH043	0	+/-	+/-	0	+	-	-	0	++	+	0	++	++	-
DLPH044	-	+/-	+/-	0	+	-	-	0	++	+	0	-	++	-
DLPH045	-	+/-	+/-	0	+	+	-	0	-	+	0	++	++	++
DLPH046	--	+/-	-	0	-	-	-	0	-	+	0	-	++	-
DLPH047	0	+/-	-	0	+	-	-	0	-	+	0	+	++	++
DLPH048	-	+/-	-	0	-	+	-	0	-	+	0	-	--	++
DLPH049	0	+/-	+/-	0	-	-	-	0	-	+	-	-	--	++
DLPH050	-	+/-	+/-	-	-	+	--	-	-	++	-	++	--	++
DLPH051	0	+/-	+/-	0	+	-	-	0	-	+	-	++	++	++
DLPH052	-	+/-	-	0	-	-	-	0	-	+	-	++	++	++
DLPH053	0	+/-	-	0	--	-	-	0	-	+	0	-	++	++
DLPH054	-	+/-	+/-	0	-	-	-	0	-	+	-	++	++	++
DLPH055	0	+/-	+/-	0	--	-	-	0	-	+	0	-	++	-
DLPH056	-	+/-	+/-	0	--	+	-	0	-	+	0	++	++	++
DLPH057	-	+/-	-	0	-	+	-	0	-	+	0	++	-	++

Site Reference	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
DLPH058	0	+/-	+/-	0	-	-	-	0	-	+	0	-	++	-
DLPH059	0	+/-	+/-	0	+	-	-	0	-	+	0	-	++	-
DLPH060	0	+/-	+/-	0	+	+	-	0	-	+	0	++	-	++
DLPH061	0	+/-	-	0	-	-	-	0	-	+	0	-	++	++
DLPH062	0	+/-	+/-	0	-	-	-	0	++	+	0	++	-	++
DLPKQH1	0	+/-	--	-	--	-	--	-	-	++	0	+	++	++
SA002	0	+/-	+/-	0	-	-	-	0	++	+	0	+	++	-
SA003-H	0	+/-	+/-	0	+	-	-	0	-	+	0	-	++	++
SA004	-	+/-	+/-	0	+	-	-	0	-	+	-	++	++	-
SA006	0	+/-	+/-	0	-	-	-	0	-	+	0	-	+	-
SA008	-	+/-	+/-	0	-	-	-	0	-	+	-	-	++	++
SA012	0	+/-	+/-	0	-	-	-	0	++	+	0	++	++	++
SA013	0	+/-	+/-	0	-	-	-	0	++	+	0	++	++	++
SA014	-	+/-	-	0	-	-	-	0	++	+	-	-	++	++
SA017	-	+/-	-	0	+	-	-	0	++	+	0	++	++	-
SA019	0	+/-	+/-	0	-	-	-	0	-	+	0	-	++	++
SA021	0	+/-	-	-	-	-	--	-	-	+	0	++	++	++
SA022	-	+/-	-	0	+	-	-	0	-	+	0	++	++	++
SA023	-	+/-	-	0	+	-	-	0	-	+	0	++	++	++
SA025	0	+/-	-	0	+	-	-	0	-	+	0	+	++	-
SA028	0	+/-	-	0	+	-	-	0	-	+	0	-	+	++
SA029	0	+/-	-	0	--	-	-	0	-	+	-	-	++	++
SA030	0	+/-	-	0	+	-	-	0	-	+	-	-	++	++
SA033	0	+/-	-	0	--	-	-	0	-	+	0	-	++	++
SA035	-	+/-	-	0	--	-	-	0	++	+	0	-	++	++
SA036-H	-	+/-	+/-	0	+	-	-	0	++	+	0	-	++	++
SA042	0	+/-	+/-	0	-	-	-	0	-	+	0	+	++	++
SA045	-	+/-	+/-	0	+	-	-	0	-	+	0	++	++	++
SA046	-	+/-	+/-	0	+	-	-	0	-	+	-	++	++	++
SA047-H	0	+/-	-	-	-	-	--	-	-	++	0	-	-	++
SA048	0	+/-	-	-	-	-	--	-	-	++	0	-	++	++
SA049	0	+/-	-	-	-	-	--	-	++	++	-	+	++	-
SA051	0	+/-	-	0	--	-	-	0	-	+	-	++	++	++
SA056	-	+/-	-	0	--	-	-	0	-	+	0	++	++	++
SA057	0	+/-	+/-	0	+	-	-	0	-	+	-	++	-	++
SA058	0	+/-	-	0	+	-	-	0	-	+	0	-	++	-
SA059-H	0	+/-	+/-	0	--	+	-	0	++	+	-	++	--	++
SA061	0	+/-	+/-	0	--	-	-	0	++	+	-	-	++	++
SA063	0	+/-	-	0	-	-	-	0	-	+	0	++	++	++
SA067	0	+/-	-	0	+	-	-	0	++	+	0	++	++	++
SA068	0	+/-	+/-	0	+	+	-	0	-	+	0	++	-	++



Site Reference	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
SA069	-	+/-	+/-	0	+	-	-	0	-	+	-	-	++	++
SA072-H	-	+/-	-	0	-	-	-	0	-	+	-	-	++	-
SA076	0	+/-	+/-	0	+	-	-	0	-	+	-	++	++	++
SA080	-	+/-	-	0	--	+	-	0	++	+	0	++	++	++
SA106	0	+/-	-	0	+	+	-	0	++	+	-	++	--	++
SA110	0	+/-	+/-	0	+	+	-	0	-	+	0	-	-	++
SA111	-	+/-	+/-	0	+	+	-	0	-	+	-	++	-	++
SA112	-	+/-	-	-	--	+	--	-	++	++	-	++	--	++
SA113	0	+/-	-	0	+	+	-	0	++	+	-	++	-	++
SA114	0	+/-	-	0	+	-	-	0	++	+	-	++	-	++
SA131	-	+/-	+/-	0	+	+	-	0	-	+	-	++	-	-
SA132	-	+/-	-	0	-	-	-	0	-	+	0	++	++	-
SA133	0	+/-	-	-	+	+	--	-	++	++	0	-	-	-
SA134	0	+/-	-	0	--	+	-	0	++	+	0	++	-	++
SA135	--	+/-	-	-	--	+	-	-	-	++	0	+	-	++
SA136	-	+/-	-	0	--	-	--	0	-	++	-	++	--	++
DLPE01	0	+/-	+/-	+/-	-	-	-	+/-	++	0	-	+	++	0
DLPE02	-	+/-	+/-	+/-	-	+	-	+/-	-	0	-	+	++	0
DLPE03	0	+/-	-	+/-	+	-	-	+/-	-	0	0	-	++	0
DLPE04	0	+/-	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0
DLPE05	-	+/-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
DLPE06	0	+/-	-	+/-	+	-	-	+/-	-	0	0	-	++	0
DLPE07	-	+/-	+/-	+/-	--	-	-	+/-	-	0	-	-	++	0
DLPE08	0	+/-	+/-	+/-	-	+	-	+/-	++	0	0	++	++	0
DLPE09	0	+/-	+/-	+/-	+	-	-	+/-	-	0	0	-	+/-	0
DLPE10	0	+/-	+/-	+/-	+	-	-	+/-	-	0	-	+	+/-	0
DLPE11	0	+/-	+/-	+/-	-	-	-	+/-	-	0	0	++	+/-	0
DLPE12	-	+/-	+/-	+/-	-	-	-	+/-	++	0	0	++	++	0
DLPE13	-	+/-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
SA003-E	0	+/-	+/-	+/-	+	-	-	+/-	-	0	0	-	++	0
SA036-E	-	+/-	+/-	+/-	+	-	-	+/-	++	0	0	-	++	0
SA044	-	+/-	+/-	+/-	+	-	-	+/-	++	0	0	-	++	0
SA047-E	0	+/-	-	+/-	-	-	-	+/-	-	0	0	-	+/-	0
SA059-E	0	+/-	+/-	+/-	--	+	-	+/-	++	0	-	+	+/-	0
SA070	0	+/-	+/-	+/-	-	-	-	+/-	++	0	0	-	++	0
SA072-E	-	+/-	-	+/-	-	-	-	+/-	-	0	-	-	++	0
SA078	0	+/-	-	+/-	--	+	-	+/-	++	0	0	++	+/-	0
SA079	0	+/-	+/-	+/-	+	+	-	+/-	-	0	0	++	+/-	0
SA081	0	+/-	+/-	+/-	+	-	-	+/-	-	0	-	++	+/-	0
SA082	-	+/-	-	+/-	+	-	-	+/-	++	0	0	++	+/-	0
SA083	0	+/-	+/-	+/-	--	-	-	+/-	-	0	0	++	+/-	0

Site Reference	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
SA084	-	+/-	+/-	+/-	-	-	-	+/-	++	0	0	+	+/-	0
SA085	-	+/-	-	+/-	-	+	-	+/-	++	0	0	-	+/-	0
SA086	-	+/-	-	+/-	+	+	-	+/-	-	0	0	+	+/-	0
SA087	0	+/-	+/-	+/-	--	+	-	+/-	-	0	-	++	+/-	0
SA088	0	+/-	+/-	+/-	+	+	-	+/-	-	0	0	++	+/-	0
SA089	-	+/-	+/-	+/-	+	+	-	+/-	-	0	-	++	+/-	0
SA090	0	+/-	+/-	+/-	-	+	-	+/-	-	0	0	-	+/-	0
SA091	-	+/-	+/-	+/-	--	+	-	+/-	-	0	-	++	+/-	0
SA092	--	+/-	-	+/-	--	+	-	+/-	-	0	0	+	+/-	0
DLP BHOS1	-	+/-	+/-	+/-	-	-	-	+/-	-	0	-	++	+/-	0
DLP BHOS2	-	+/-	-	+/-	-	-	-	+/-	-	0	-	-	+/-	0
DLP BHOS3	-	+/-	+/-	+/-	-	-	-	+/-	-	+	0	++	+/-	++
DLP DOS1	-	+/-	+/-	+/-	+	+	-	+/-	-	0	0	++	+/-	0
DLP DOS2	-	+/-	+/-	0	--	+	-	0	-	+	-	++	+/-	++
DLP DOS3	--	+/-	+/-	0	+	+	-	0	-	+	-	++	+/-	++
DLP DOS4	-	+/-	+/-	0	+	+	-	0	-	+	-	++	+/-	++
DLP DPS1	-	+/-	+/-	0	--	+	--	0	-	++	-	-	+/-	++
DLP DPS2	-	+/-	+/-	-	-	-	--	-	-	++	-	++	+/-	++
DLP H0S1	-	+/-	-	0	-	+	-	0	-	+	0	-	+/-	++
DLP H0S2	-	+/-	-	0	--	-	-	0	-	+	0	-	+/-	++
DLP H0S3	-	+/-	-	0	-	+	-	0	-	+	0	-	+/-	++
DLP H0S4	-	+/-	-	0	-	+	-	0	-	+	0	-	+/-	++
DLP H0S5	0	+/-	+/-	0	+	+	-	0	-	+	0	-	++	++
DLP SOS1	-	+/-	-	0	--	-	-	0	++	+	0	-	+/-	++
DLP SOS2	-	+/-	-	+/-	--	-	-	+/-	++	0	0	-	+/-	0
DLP SOS3	-	+/-	+/-	0	+	+	-	0	++	+	0	-	+/-	++
DLPH006/DLPH007	-	+/-	-	-	--	+	--	-	-	++	-	-	+/-	++
DLP GT001	0	+/-	+/-	+/-	+	+	-	+/-	++	+/-	0	++	++	++
DLP GT002	-	+/-	--	+/-	--	+	-	+/-	-	+/-	0	-	++	-
DLP GT003	-	+/-	-	+/-	--	-	-	+/-	++	+/-	-	++	++	++
DLP GT004	-	+/-	-	+/-	--	+	-	+/-	-	+/-	0	++	++	-
DLP GT005	0	+/-	-	+/-	-	+	-	+/-	-	+/-	0	-	++	-
DLP GT006	-	+/-	-	+/-	--	+	-	+/-	++	+/-	0	+	+	-
SA GT007	-	+/-	--	+/-	+	+	-	+/-	-	+/-	-	++	++	-
SA GT008	0	+/-	+/-	+/-	-	-	-	+/-	-	+/-	0	-	++	++
SA GT009	0	+/-	-	+/-	-	-	-	+/-	++	+/-	-	+	++	-
SA GT010	-	+/-	+/-	+/-	-	-	-	+/-	-	+/-	-	-	++	++
SA GT011	0	+/-	+/-	+/-	+	-	-	+/-	-	+/-	0	-	++	-
SA GT012	0	+/-	+/-	+/-	-	+	-	+/-	-	+/-	-	++	-	++
SA GT013	0	+/-	+/-	+/-	-	-	-	+/-	-	+/-	-	++	++	++
SA GT014	0	+/-	+/-	+/-	-	-	-	+/-	++	+/-	0	++	++	++

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Site Reference	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SA GT015	0	+/-	+/-	+/-	+	-	-	+/-	++	+/-	0	-	++	-
SA GT016	-	+/-	-	+/-	+	-	-	+/-	++	+/-	0	-	++	++
SA GT017	0	+/-	+/-	+/-	-	-	-	+/-	++	+/-	-	++	++	++
SA GT018	-	+/-	-	+/-	--	-	-	+/-	++	+/-	0	++	++	-
SA GT019	-	+/-	+/-	+/-	-	-	-	+/-	-	+/-	-	-	++	-
SA GT020	0	+/-	+/-	+/-	-	-	-	+/-	-	+/-	0	-	+	-
SA GT021	-	+/-	--	+/-	--	-	-	+/-	-	+/-	-	++	++	++

## 7.3 Mitigation

- 7.3.1 The sustainability appraisal of 211 reasonable alternative sites against baseline sustainability information has identified a number of adverse effects associated with the SA Objectives in the SA Framework (see **Table 7.1**). The purpose of this chapter is to consider if and how these effects can be mitigated by applying the mitigation hierarchy.
- 7.3.2 The first stage of the mitigation hierarchy is to consider if the adverse effect can be avoided. This may be possible by withdrawing the potential site allocation.
- 7.3.3 For allocations which are likely to remain on the basis that the plan makers consider their inclusion to be necessary, mitigation measures should be explored to reduce the overall significance of effect. If it is not possible to mitigate identified adverse effects, these will remain at the end of the SA process and will be declared in the environmental report and non-technical summary.
- 7.3.4 One way to reduce adverse impacts identified against baseline receptors is to consider the potential mitigating effects of planning policies.
- 7.3.5 Aspects of the policies within the draft DLP (see **Appendices D and E**), would be anticipated to help ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the DLP, are avoided, reduced or mitigated.
- 7.3.6 **Tables 7.2 to 7.14** list the identified adverse impacts according to SA Objective that could potentially arise following development at the 211 reasonable alternative sites. The table then goes on to list which, if any, of the draft DLP policies would be likely to help avoid or mitigate these adverse impacts.

**Table 7.2:** Mitigating DLP Policy for SA Objective 1 – Cultural Heritage

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Alteration of character or setting of a heritage asset</b></p>	<p>Policy DLP55 (Historic Character and Local Distinctiveness in Dudley) would be expected to help mitigate potential adverse impacts on the local historic environment, through safeguarding and resisting any development proposals that would be detrimental to the character of heritage assets or their settings. Underpinning Policy DLP55 are policies DLP56, DLP57, DLP58, DLP59, DLP60, DLP61 and DLP62, which set out measures to conserve and enhance specific heritage designations including both nationally and locally important buildings and structures, as well as archaeological features, which contribute towards the historic environment.</p> <p>Policy DLP36 (Canals) states that development proposals likely to affect the canal network will be required to “<i>protect and enhance its special historic, architectural, archaeological, and cultural significance and their setting</i>”. This policy would protect the various</p>	<p>These policies would be expected to mitigate the identified adverse impacts on the local historic environment which may occur following development proposals, including impacts on the character and/or setting of Listed Buildings, Conservation Areas, SMs, RPGs and</p>

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>heritage assets that are found within or in close proximity to the canal network throughout the borough.</p> <p>Policy DLP35 (Geodiversity and the Black Country UNESCO Global Geopark) states that development will <i>"be resisted where they would have significant adverse impact on the Geopark geosites"</i> which may be linked to historic features.</p> <p>Policy DLP4 (Achieving Well Designed Places), DLP39 (Design Quality), DLP40 (Landscape Design) and several other landscape-focused policies, seeks to ensure that development proposals reflect their local context and pursue high quality design, which would be likely to ensure that development proposals conserve and enhance the historic environment.</p> <p>Various DLP policies relating to the centres of Brierley Hill (DLPBH2, DLPBH5, DLPBH6), Dudley (DLPD3, DLPD4, DLPD5, DLPD6, DLPD7), Stourbridge (DLPS3, DLPS4, DLPS6) and Halesowen (DLPH3, DLPH4, DLPH6, DLPH7) would ensure that development in these areas respects, conserves and enhances historic character.</p>	<p>Archaeological Sensitive Areas.</p>

**Table 7.3:** Mitigating DLP Policy for SA Objective 2 - Landscape

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Threaten or result in the loss of sensitive or locally distinctive landscapes</b></p>	<p>Policy DLP4 (Achieving Well Designed Places) ensures that development proposals are designed to be in keeping with the surrounding landscape character, stating <i>"all development will be required to demonstrate a clear understanding of the historic character and local distinctiveness of its location and show how proposals make a positive contribution to place-making"</i>.</p> <p>Policy DLP39 (Design Quality) promotes high standards of design and would ensure that development proposals implement the principles of the National Design Guide and other criteria. The policy sets out the protection of strategic gaps and views and seeks to enhance the character of Dudley's towns and settlements.</p> <p>Several other 'Environmental Transformation' policies including DLP33 and DLP34 would ensure that tree and hedgerow coverage is conserved and enhanced.</p>	<p>These policies would be expected to ensure that potential adverse impacts on the landscape / townscape are avoided and would encourage new developments to promote regeneration within Dudley's centres, with benefits to local character and distinctiveness.</p>

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Policy DLP51 (Dudley Borough’s Green Network) would help to conserve and enhance the GI network within the borough, with multi-functional benefits including for landscape.</p> <p>Policy DLP55 (Historic Character and Local Distinctiveness in Dudley) and other ‘Historic Environment’ policies would ensure the locally distinctive landscape character of Dudley is protected and enhanced where possible.</p> <p>Policy DLP40 (Landscape Design) aims to “<i>enhance the appearance and landscape setting of the development scheme</i>” through the inclusion of native trees and shrub species in on-site landscaping schemes.</p> <p>Policy DLP49 (Green Belt) aims to maintain a strong Green Belt within Dudley and would ensure that new development is only permitted within the Green Belt in exceptional circumstances.</p> <p>Various DLP policies relating to the centres of Brierley Hill (DLPBH2, DLPBH3, DLPBH4, DLPBH5, DLPBH6), Dudley (DLPD1, DLPD3, DLPD4, DLPD5, DLPD6, DLPD7), Stourbridge (DLPS2, DLPS3, DLPS4, DLPS5, DLPS6, DLPS7) and Halesowen (DLPH3, DLPH4, DLPH5, DLPH6, DLPH7, DLPH8) seek to conserve and enhance townscape character and ensure that development proposals in these areas have regard to key views and vistas.</p>	

**Table 7.4:** Mitigating DLP Policy for SA Objective 3 – Biodiversity

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Threats or pressures to international or Habitats sites (SACs)</b></p>	<p>Policy DLP31 (Nature Conservation) states that development will not be permitted where it would “<i>have an adverse impact on the integrity of a European or internationally designated site, including Special Areas of Conservation (SAC)</i>”. The policy has an overarching aim of providing development that will “<i>safeguard nature conservation, inside and outside its boundaries</i>”. The HRA Appropriate Assessment sets out the range of policies within the DLP which would serve to mitigate the potential impacts on Habitats sites from a range of pathways, including relating to air quality, water quality, public access and disturbance.</p>	<p>This policy would be expected to mitigate potential adverse impacts on Habitats sites and associated functionally linked land, subject to the recommendations of the HRA.</p>

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Furthermore, Policy DLP31 requires all development to consider opportunities for enhancing the natural environment by restoring and creating new habitats and improving wildlife movement and connectivity, which could lead to benefits for supporting habitats.</p>	
<p><b>Threats or pressures to nationally designated sites (NNRs and SSSIs)</b></p>	<p>Policy DLP31 (Nature Conservation) states that <i>"development is not permitted where it would harm ... Sites of Special Scientific Interest and National Nature Reserves"</i>.</p> <p>Policy DLP51 (Dudley Borough's Green Network) identifies SSSIs and NNRs as part of the GI network in the borough and requires development to <i>"have a design and layout which would complement and enhance the intended functions of the network. This includes strengthening and supporting existing wildlife corridors through habitat creation and restoration"</i>.</p> <p>Policy DLP52 (The Borough's Geology) seeks to safeguard and enhance geological sites and wider connectivity, including <i>"National and Local Nature reserves with unique/ nationally important geological heritage"</i>.</p>	<p>These policies would help to mitigate potential adverse impacts identified on NNRs and SSSIs for the majority of sites. However, at this stage, the policies <b>would not</b> be anticipated to fully mitigate adverse effects on SSSIs where proposed sites coincide with, or are located directly adjacent to, SSSIs. These sites should be subject to specific consultation with Natural England (DLPKQH1 and DLPH028).</p>
<p><b>Threats or pressures to locally designated / non-statutory biodiversity or geodiversity sites, priority habitats and species</b></p>	<p>Policy DLP31 (Nature Conservation) states that development in Dudley will safeguard nature conservation through ensuring that <i>"locally designated nature conservation sites (Sites of Local Importance for Nature Conservation), important habitats and geological features are protected from development proposals that could negatively impact them"</i>.</p> <p>Policy DLP32 (Nature Recovery Network and Biodiversity Net Gain) encourages opportunities to enhance the quality and quantity of habitats and improve connectivity for flora and fauna including priority habitats.</p> <p>Policy DLP33 (Provision, Retention and Protection of Trees, Woodlands and Ancient Woodland, and Veteran Trees) would</p>	<p>These policies would help to mitigate potential adverse impacts identified on SINC, SLINC, ancient woodland, priority habitats and geological sites for the majority of proposed development sites. However, at this stage, the policies</p>

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>encourage the protection of trees and woodlands, and where their loss is deemed unavoidable ensure that compensatory measures and re-planting are sought, leading to an increase in canopy cover in the longer term.</p> <p>Policy DLP35 (Geodiversity and the Black Country UNESCO Global Geopark) ensures that <i>"geological sites of International, national or regional importance are clearly identified"</i> and that development should <i>"make a positive contribution to the protection and enhancement of geodiversity"</i>.</p> <p>Policy DLP51 (Dudley Borough's Green Network) identifies SLINCs as part of the GI network in the borough and requires development to strengthen and support the green network as a whole.</p>	<p><b>would not</b> be anticipated to fully mitigate adverse effects on sites which coincide with SINCS, SLINCs, or which coincide with large areas of priority habitat.</p>
<p><b>Effects on green infrastructure and ecological networks</b></p>	<p>Policy DLP32 (Nature Recovery Network and Biodiversity Net Gain) seeks to ensure that all developments deliver a minimum 10% BNG in line with statutory requirements, and require development to <i>"provide for the protection, enhancement, restoration and creation of wildlife habitat and green infrastructure"</i>. The policy also requires development to take into account the location of proposed development in relation to the Local Nature Recovery Network.</p> <p>Policy DLP51 (Dudley Borough's Green Network) states that development proposals falling within the Green Network will be designed to <i>"complement and enhance the intended functions of the network. This includes strengthening and supporting existing wildlife corridors through habitat creation"</i>.</p> <p>Policy DLP53 (Parks) seeks to protect the role of parks in Dudley for community use and nature conservation.</p> <p>Policy DLP54 (River Stour and its Tributaries) requires development proposals in close proximity to the River Stour to <i>"enable the restoration of the natural riverbank habitat"</i> and additionally <i>"seek to retain, or create, an area of Green Infrastructure either side of the River Stour channel and its tributaries"</i>.</p> <p>Policy DLP40 (Landscape Design) requires the inclusion of native trees and shrub species within on-site landscaping schemes that aim to <i>"strengthen and provide beneficial wildlife habitat"</i>.</p>	<p>These policies would be likely to help enhance the connectivity between habitats and improve the resilience of ecological and GI networks to current and future pressures.</p>



Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Various DLP policies relating to the centres of Brierley Hill (DLPBH3, DLPBH4), Dudley (DLPD4, DLPD7), Stourbridge (DPS2, DLPS5, DLPS7) and Halesowen (DLPH5, DLPH6) seek to ensure that development proposals in these areas integrate GI, including tree cover, and improve biodiversity.</p>	

**Table 7.5:** Mitigating DLP Policy for SA Objective 4 – Climate Change mitigation

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Increased carbon emissions</b></p>	<p>Policy DLP41 (Increasing Efficiency and Resilience) ensures that development proposals will include opportunities for adaptation to, and mitigation of climate change. The policy includes measures to improve green cover, minimise flood risk, encourage use of greywater recycling and the promote natural heating systems.</p> <p>The criteria of Policy DLP41 is underpinned by other DLP Policies, including DLP42 (Energy Infrastructure), DLP43 (Managing Heat Risk), DLP44 (Air Quality) and DLP47 (Renewable and Low Carbon Energy and BREEAM Standards), collectively aiming to reduce the borough’s carbon footprint.</p> <p>Policy DLP42 aims to provide a more efficient energy infrastructure within the borough, decreasing the energy requirement of the borough and consequently decreasing GHG emissions.</p> <p>Policy DLP43 ensures that development proposals are of efficient design to help reduce the risk of heat gain and the urban heat island effect (UHI).</p> <p>Policy DLP47 would help to ensure development proposals are more energy efficient and seek opportunities to utilise renewable and low carbon energy sources. Under the policy, 20% of energy used for major developments and 10% for minor developments should be from renewable sources.</p>	<p>Although these policies strongly support a reduction in GHG emissions associated with development, the policies <b>would not</b> be expected to fully mitigate GHG emissions from development, including from embodied carbon, emissions from the construction and operation of development and potential loss of carbon stores, such as in soils.</p>

**Table 7.6:** Mitigating DLP Policy for SA Objective 5 – Climate Change adaptation

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Risk of surface water flooding</b></p>	<p>Policy DLP45 (Flood Risk) seeks to minimise surface water flood risk and requires development proposals to prepare Surface Water Drainage Strategies including SuDS, as well as encouraging enhanced green and blue infrastructure networks that act as natural flood management methods.</p> <p>Policy DLP46 (Sustainable Drainage and Surface Water Management) supports Policy DLP45 and requires new development proposals to incorporate SuDS, including the details of their adoption, ongoing maintenance and management.</p> <p>Policy DLP41 states that “<i>development will be required to incorporate mitigation and resilience measures designed to reduce the risk of river, surface and other potential water flooding</i>”.</p>	<p>These policies would be expected to mitigate potential adverse impacts associated with development in areas at risk of surface water flooding.</p>
<p><b>Risk of fluvial flooding (current and future)</b></p>	<p>Policy DLP45 (Flood Risk) seeks to minimise fluvial flood risk, through the requirement for site-specific Flood Risk Assessments and application of the Sequential Test, taking into account the most up to date Strategic Flood Risk Assessment information and including allowance for climate change. The policy also requires development proposals to incorporate surface water drainage strategies that include SuDS and green and blue infrastructure networks that act as natural flood management methods.</p> <p>Policy DLP51 (Dudley Borough’s Green Network) and other ‘Green Infrastructure’ policies would help to conserve and enhance the GI network within the borough, with multi-functional benefits including for flood risk.</p> <p>Policy DLP4 (Achieving Well Designed Places) encourages the use of well-located open spaces to help mitigate flood risk.</p> <p>Policy DLP41 states that “<i>development will be required to incorporate mitigation and resilience measures designed to reduce the risk of river, surface and other potential water flooding</i>”.</p>	<p>These policies would be expected to mitigate potential adverse impacts associated with development in areas at risk of fluvial flooding and would ensure that the impacts of climate change are considered over the lifetime of the development.</p>

**Table 7.7:** Mitigating DLP Policy for SA Objective 6 – Natural Resources

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Loss of previously undeveloped land or land with environmental value</b></p>	<p>Policy DLP49 (Green Belt) aims to maintain a strong Green Belt that will promote development within the urban area, protecting the undeveloped land surrounding the urban area.</p> <p>The spatial strategy policies including DLP1 and DLP2 set out the majority of growth to be located on brownfield land, reducing the need for development on previously undeveloped or greenfield locations.</p> <p>Policy DLP51 (Dudley Borough’s Green Network) and other ‘Green Infrastructure’ policies would help to conserve and enhance the GI network within the borough, with multi-functional benefits including for conservation of soils.</p> <p>Policy DLP33 (Provision, Retention and Protection of Trees, Woodlands and Ancient Woodland, and Veteran Trees) would encourage the protection of trees and woodlands, which could also lead to benefits in terms of preventing soil erosion and promoting soil stability.</p> <p>Policy DLP86 (Unstable Land) would ensure that any potential issues with land instability are investigated and addressed prior to development.</p> <p>Policies DLP32 (Nature Recovery Network and Biodiversity Net Gain) and DLP37 (Open Space and Recreation) would help to ensure that developers recognise the benefits of open spaces and conserve / enhance open spaces and deliver BNG on site, with associated benefits for the underlying soil resource.</p>	<p>The policies would help to promote an efficient use of land and reduce the loss of undeveloped land and associated soil resources; however, the policies <b>would not</b> be expected to fully mitigate these impacts and some small-scale losses of soil would remain.</p>

**Table 7.8:** Mitigating DLP Policy for SA Objective 7 – Pollution

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Increase in, and exposure to, air pollution (from main roads or AQMA)</b></p>	<p>Policy DLP44 (Air Quality) addresses air quality issues across the borough and promotes sustainable modes of transport to reduce emissions, requiring development to promote active modes of transport and provide electric vehicles with charging points as part of their transport provision. The policy requires new developments to be air quality neutral as a minimum and requires an appropriate Air Quality Assessment where development</p>	<p>These policies will help to minimise adverse impacts associated with the exposure of site end users to poor air quality within or</p>

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>proposals are located in an area that does not meet national objectives.</p> <p>Policy DLP79 (Resource Management and New Development) rejects development proposals that are incompatible with environmental aims, identifying issues that would need to be mitigated and addressed, including air quality.</p> <p>Policy DLP47 (Renewable and Low Carbon Energy and BREEAM Standards) supports renewable and low carbon technologies that would result in reduced emissions of pollutants.</p> <p>Policies DLP8 (Health and Wellbeing), DLP41 (Increasing Efficiency and Resilience), DLP42 (Energy Infrastructure) and DLP43 (Managing Heat Risk) include measures that will improve the air quality within the borough by reducing emissions of pollutants.</p> <p>Policy DLP51 (Dudley Borough’s Green Infrastructure Network) and other ‘Green Infrastructure’ policies would help to conserve and enhance the GI network within the borough, with multi-functional benefits including for filtration of air pollutants and improving air quality. Policy DLPBH4 (Green Infrastructure in Brierley Hill) sets out the aim to plant a minimum of 5,000 new trees within Brierley Hill, with likely benefits for development in this centre in terms of air quality.</p>	<p>adjacent to AQMAs, and impacts associated with reduced air and noise quality alongside main roads or railway lines. However, these policies <b>would not</b> be expected to fully mitigate the adverse impacts on air pollution associated with the large scale of proposed development across the Plan area.</p>
<p><b>Risk of contamination of groundwater Source Protection Zones</b></p>	<p>Policy DLP48 (Water Quality and Groundwater Source Protection Zones) states that “<i>no development will be permitted within a groundwater Source Protection Zone that would physically disturb an aquifer, and no permission will be granted without a risk assessment demonstrating there would be no adverse effect on water resources</i>”.</p> <p>Policy DLP46 (Sustainable Drainage and Surface Water Management) identifies the importance of integrating SuDS into developments, that can provide wider benefits to water quality.</p>	<p>These policies would be expected to mitigate potential adverse impacts on the quality of groundwater SPZs as result of the proposed development.</p>
<p><b>Risk of contamination of watercourses</b></p>	<p>Policy DLP46 (Sustainable Drainage and Surface Water Management) identifies the importance of integrating SuDS into developments, that can provide wider benefits to water quality.</p> <p>Policy DLP48 (Water Quality and Groundwater Source Protection Zones) ensures development proposals will not “<i>result in an unacceptable risk to the quality and / or quantity of a water body</i>”</p>	<p>These policies may help to lessen adverse impacts on water quality; however, they <b>would not</b> be expected to fully mitigate these effects,</p>

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p><i>or water bodies</i>” and ensure development with non-mains drainage has <i>“no detrimental impact on the water environment”</i>.</p> <p>Policy DLP85 (Contaminated Land) requires a preliminary risk assessment to be carried out at the planning stage for major sites and a risk assessment at smaller sites that suspect land contamination, such assessments will prevent exposures to contaminated water supplies.</p> <p>Policy DLP36 (Canals) seeks to <i>“protect and enhance water quality in the canal and protect water resource availability both in the canal and the wider environment”</i>.</p>	<p>associated with run-off and drainage from new developments.</p>

**Table 7.9:** Mitigating DLP Policy for SA Objective 8 – Waste

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Increase in waste generation</b></p>	<p>Policies DLP75 (Waste Infrastructure), DLP76 (Waste Sites), DLP77 (Preferred Areas for New Waste Facilities) and DLP79 (Resource Management and New Development) would help to ensure that waste facilities meet the current and future demands of the borough in regard to capacity and are sustainable by nature / design and are in suitable locations.</p> <p>Policy DLP75 in particular would ensure that waste is managed in line with the waste hierarchy, promoting the re-use and recycling of materials.</p> <p>Policies DLP15 (Accommodation for Gypsies and Travellers and Travelling Showpeople), DLP17 (Houses in Multiple Occupation) and DLP28 (Residential Developments in Centres) would be expected to ensure that these communities have adequate waste and recycling facilities available to them.</p>	<p>These policies would be likely to encourage recycling and appropriate waste disposal within new developments; however, the policies <b>would not</b> be expected to fully mitigate the likely increase in household waste associated with the proposed growth through the DLP.</p>

**Table 7.10:** Mitigating DLP Policy for SA Objective 9 – Transport and Accessibility

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Limited access to bus services</b></p>	<p>Policy DLP6 (Infrastructure Provision) identifies the infrastructure required to support the growth expected from the DLP, including transport infrastructure.</p> <p>Policy DLP67 (The Transport Network) outlines the priorities for Dudley’s transport network, identifying key projects and schemes and requiring all developments to “<i>provide access for all modes of travel</i>”.</p> <p>Policy DLP68 (The Key Route Network) provides mitigation measures to manage the KRN, streamlining public transport systems throughout the borough and managing potential adverse impacts associated with increased road users.</p> <p>Policy DLP72 (Demand for Travel and Travel Choices) states that a priority for traffic management is “<i>identifying appropriate strategic and local Park and Ride sites on current public transport routes to ease traffic flows into centres</i>”.</p> <p>Policies DLP24 (Dudley Borough Centres) and DLP25 (Local and District Centres and Local Services) include measures to encourage and support sustainable transport methods.</p> <p>Various DLP policies relating to the centres of Brierley Hill (DLPBH7), Dudley (DLPD8), Stourbridge (DLPS8) and Halesowen (DLPH8) aim to improve the transport networks within the centres including public transport and active travel.</p>	<p>The proposed improvements to the transport network through the policies would be expected to mitigate the restricted access to bus services within Dudley, which only affects a small number of reasonable alternative sites.</p>
<p><b>Limited access to railway stations</b></p>	<p>Policy DLP4 (Achieving Well Designed Places) states that “<i>transport proposals should include connections to and between transport hubs, ensuring that interventions make a positive contribution to place-making and increase accessibility and connectivity</i>”.</p> <p>Policy DLP6 (Infrastructure Provision) identifies the infrastructure required to support the growth expected from the DLP, including transport infrastructure.</p> <p>Policy DLP67 (The Transport Network) outlines the priorities for Dudley’s transport network, including the railway network and the accompanying railway projects.</p> <p>Policy DLP70 (The Movement of Freight) states “<i>existing and disused railway lines will be safeguarded for transport and movement related uses</i>”.</p> <p>Policies DLP24 (Dudley Borough Centres) and DLP25 (Local and District Centres and Local Services) identify the need for</p>	<p>The policies encourage the use of the railway network in the borough and would be expected to improve public transport infrastructure across Dudley, with benefits to connectivity of different transport modes.</p>

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>sustainable modes of transport as alternatives to private car use, supporting sustainable methods which include the railway network.</p> <p>Various DLP policies relating to the centres of Brierley Hill (DLPBH7), Dudley (DLPD8), Stourbridge (DLPS8) and Halesowen (DLPH8) aim to improve the transport networks within the centres including public transport and active travel.</p>	
<p><b>Limited access to local services and facilities</b></p>	<p>Policy DLP1 (Development Strategy) sets out the intention to deliver new homes, jobs and local services. Policy DLP2 (Growth Network) seeks to ensure that new homes are located "<i>in sustainable locations well-supported by community services and local shops</i>".</p> <p>Policy DLP67 (The Transport Network) outlines the priorities for Dudley's transport network, identifying key projects and schemes and requiring all developments to "<i>provide access for all modes of travel</i>".</p> <p>Policy DLP68 (The Key Route Network) provides mitigation measures to manage the KRN, streamlining public transport systems throughout the borough and managing potential adverse impacts associated with increased road users to improve accessibility within the borough.</p> <p>Within Policy DLP25 (Local and District Centres and Local Services), development proposals are required to provide "<i>means other than by car</i>" to fit into the aims of "<i>15-minute neighbourhoods</i>".</p> <p>Policies DLP24 (Dudley Borough Centres), DLP25, DLP41 (Increasing Efficiency and Resilience), DLP83 (Access for All), and DLP71 (Active Travel) provide measures that encourage active modes of transport and increase accessibility to local services and facilitates.</p> <p>Several 'Centres and Town Centre Uses' and 'Employment' policies would support the provision of new and improved local services and retail opportunities to serve new and existing communities.</p> <p>Policy DLP71 (Active Travel) ensures that the borough provides walking and cycling infrastructure to promote sustainable travel choices.</p> <p>Policies DLP24 (Dudley Borough Centres), DLP25 (Local and District Centres and Local Services), DLP41 (Increasing Efficiency</p>	<p>These policies would be expected to improve sustainable access to local services and facilities across Dudley.</p>

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>and Resilience) and DLP83 (Access for All) provide measures that encourage active modes of transport.</p> <p>Various DLP policies relating to the centres of Brierley Hill (DLPBH7), Dudley (DLPD8), Stourbridge (DLPS8) and Halesowen (DLPH8) aim to improve the transport networks within the centres including public transport and active travel.</p>	

7.3.7 No adverse impacts were associated with housing (SA Objective 10).

**Table 7.11: Mitigating DLP Policy for SA Objective 11 – Equality**

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Residents located in deprived areas</b></p>	<p>Policies DLP21 (Other Employment Areas), DLP23 (Social Value), DLP24 (Dudley Borough Centres), DLP25 (Local and District Centres and Local Services), DLP26 (Small Scale Local Facilities), DLP28 (Residential Developments in Centres), DLP7 (Broadband and Telecommunications), DLP8 (Health and Wellbeing), DLP83 (Access for All), DLP71 (Active Travel) and DLP6 (Infrastructure Provision) all provide measures that provide opportunities to local facilities and services such as education, public transport, and shops.</p> <p>Policy DLP21 supports equal job opportunities in the borough, helping tackle unemployment <i>"particularly those in the most deprived areas and priority groups"</i>.</p> <p>Policy DLP8 <i>"protects and improves the physical, social and mental health and wellbeing of its residents, including children, young people and vulnerable adults and which reduces health inequalities"</i>.</p> <p>Policy DLP9 (Healthcare Infrastructure) addresses accessibility gaps to health infrastructure.</p> <p>Policy DLP83 seeks to provide a borough that is <i>"an environment accessible and inclusive to all members of its community"</i>.</p>	<p>The policies would be expected to provide increased opportunities and improved access to facilities and services within the borough, which would help to address inequalities.</p>

**Table 7.12: Mitigating DLP Policy for SA Objective 12 - Health**



Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Limited access to healthcare/ leisure facilities</b></p>	<p>Policies DLP8 (Health and Wellbeing), DLP9 (Healthcare Infrastructure), DLP6 (Infrastructure Provision) and DLP67 (The Transport Network) provide transport infrastructure that will enable access to healthcare and provide measures that assure there is healthcare infrastructure that meets the needs of the residents.</p> <p>Policy DLP8 requires Health Impact Assessments for specific development proposals, not supporting proposals that will <i>"have a significant negative impact on health and wellbeing"</i>.</p> <p>Policy DLP9 supports new healthcare facilities and would ensure good accessibility to, and design of, these facilities, locating facilities <i>"to address accessibility gaps"</i> and are strategically located in areas with good public transport links.</p>	<p>The policies would help to prevent the loss of existing facilities and would help to ensure that residents within Dudley have reasonable access to healthcare facilities.</p>
<p><b>Net loss of public greenspace</b></p>	<p>Policy DLP6 (Infrastructure Provision) identifies infrastructure required to support the growth that is expected from the DLP, included within this infrastructure provision is the provision of publicly accessible open space.</p> <p>Policy DLP49 (Green Belt) aims to focus development within urban areas and states that the Green Belt will <i>"provide easy access to the countryside where the landscape, visual amenity, nature conservation and outdoor sport and recreation value of the land will be protected and enhanced"</i>.</p> <p>Policy DLP24 (Dudley Borough Centres) includes measures to enhance centres including <i>"maximising public realm, open space, provision of green infrastructure"</i>.</p> <p>Policy DLP37 (Open Space and Recreation) and Policy DLP38 (Playing Fields and Sports Facilities) aim to increase the provision of green and open spaces across the borough.</p> <p>Policy DLP51 (Dudley Borough's Green Network) and other Green Infrastructure policies would help to conserve and enhance the GI network within the borough, with multi-functional benefits including for recreation and amenity.</p> <p>Policy DLPLGS1 allocates 'Corbett Meadow Local Green Space' for use by the local community.</p>	<p>These policies would be expected to mitigate the limited access to green spaces and ensure that development proposals do not result in the net loss of public greenspace across the Plan area.</p>

**Table 7.13:** Mitigating DLP Policy for SA Objective 13 – Economy

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Net loss of employment floorspace</b></p>	<p>Policy DLP18 (Economic Growth and Job Creation) outlines the measures to deliver a portfolio of employment sites <i>"to deliver at least 72 hectares of new employment land between 2020-2041"</i>.</p> <p>Policy DLP19 (Strategic Employment Areas) will refuse development <i>"that prejudice or dilutes the delivery of appropriate employment activity, or deters investment in such uses"</i>.</p> <p>Policy DLP20 safeguards local employment areas for specific uses as outlined within the policy, retaining employment floorspace.</p> <p>Policy DLP21 identifies 'other employment areas' that will be <i>"retained and enhanced for industrial employment uses within Class E(g)(ii), E(g)(iii), and Class B2 and B8, and allowed to be developed for such uses"</i>.</p> <p>Policy DLP22 (Balancing Employment Land and Housing) safeguards employment land, ensuring that before releasing any employment land for an alternative use, the supply of employment land is sufficient and meets the demand of the area.</p>	<p>These policies would be expected to mitigate the potential adverse impacts associated with the loss of existing employment land across the Plan area, ensuring that current employment land is only lost where it is demonstrated to be surplus to requirements.</p>

**Table 7.14:** Mitigating DLP Policy for SA Objective 14 – Education, skills and training

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Limited access to education opportunities</b></p>	<p>DLP16 (Education Facilities) includes measures to meet the educational requirements of the borough and states that educational facilities should <i>"enhance neighbourhood services and amenities"</i> and be <i>"located to address accessibility gaps"</i>.</p> <p>Policy DLP6 (Infrastructure Provision) includes measures that will provide the infrastructure needed to support residents, including transport infrastructure that would improve access to schools.</p> <p>Within the town centre chapters of the Draft DLP, Policy DLP D1 identifies the need to develop <i>"additional educational facilities to further enhance the town's existing provision and learning quarters"</i>. Policy DLPH2 (Education in Halesowen) includes measures to safeguard existing educational facilities, support the development of additional facilities and transport infrastructure to support student needs.</p>	<p>These policies would be expected to improve access to education opportunities across the Plan area.</p>

Identified adverse impact	Potential mitigating influence of Draft DLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Policies DLPHOS1, DLPHOS3, DLPHOS4 are strategic site policies that identify "local community and learning" as an appropriate use for development, which could improve access to education.</p> <p>Other general improvements to public transport and accessibility would be likely to improve sustainable access to education across the borough, including Policy DLP71 (Active Travel) and DLP67 (The Transport Network).</p>	

## 7.4 Selection and Rejection of Sites

7.4.1 PPG states that the SA/SEA process should outline the reasons why alternatives were selected and why the rejected options were not taken forward. An overview of the reasons for site selection and rejection have been provided by DMBC, as summarised for housing sites in **Table 7.15**, mixed use sites in **Table 7.16**, employment sites in **Table 7.17**, and Gypsy and Traveller sites in **Table 7.18**.

7.4.2 The information provided in **Tables 7.15 – 7.18** is intended to provide an overview only. Reasons for selection and rejection of the sites proposed at this stage in the DLP process have been informed by the findings of the SA as well as the detailed site assessment process undertaken by the Council and other evidence base documents.

7.4.3 The following sites have not been allocated due to landowners wishing to retain the current use:

- SA079 – Jews Lane
- SA133 – Stourvale Trading Estate, Banners Lane, Cradley
- SA134 – Oak Street Trading Estate, Quarry Bank
- SA135 – Land North of Brettle Lane
- SA136 – Moor Street Albion Works
- SA106 – Land off Engine Lane, Lye (south of railway)
- SA110 - 7 New Road Halesowen
- SA111 - Cousins Dudley
- SA112 - West of Engine Lane, north of the railway, Lye
- SA083 - Deepdale Lane, Upper Gornal
- SA084 - Land South of King William Street, Amblecote
- SA085 - Platts Road, Amblecote
- SA086 - Land South of Brettell Lane, Brierley Hill
- SA087 - Old Dock-Queens Cross/Wellington Road/Waterloo Street, Dudley
- SA088 - South of Northfield Road, Netherton
- SA089 - Prospect Row
- SA090 - Land off Lodgefield Road, Halesowen
- SA091 - Shaw Road, Dudley
- SA092 - Land North of Brettell Lane
- SA113 – East of Engine Lane, south of the railway, Lye



**Table 7.15:** Outline reasons for selection and rejection of reasonable alternative sites: Housing

Site Reference	Site Name	Selected/ Rejected	Reason for Selection/Rejection provided by Dudley MBC
DLP H H1	Will Thorne House	Selected	The site is a brownfield site, located in a highly sustainable town centre location. There are no red ratings in relation to the proposed site.
DLP D H4	Royal Mail Sorting Office - Trinity Road	Selected	The site is a brownfield site, located in a highly sustainable town centre location. There are no red ratings in relation to the proposed site. There is potential for a larger scale development incorporating the Dudley College/ Wolverhampton Street site (DLP D H3)
DLP D H1	Regent House	Selected	The site is a vacant brownfield site, located in a highly sustainable town centre location close to existing and emerging public transport routes. There are no red ratings in relation to the proposed site
DLP H H2	Halesowen Police Station	Selected	The site is a vacant brownfield site, located in a highly sustainable town centre location. The site is adjacent to Stour Valley SLINC with trees along the border, any development on the site should ensure that any trees and biodiversity are protected from the development. Well-designed scheme is needed to ensure no overlooking to the adjacent residential developments, and improved access to the river were appropriate. There are no red ratings in relation to the proposed site.
DLP D H3	Dudley College/ Wolverhampton Street Car Park	Selected	The site is in a highly sustainable town centre location. Any residential development would need to be designed to ensure that there would not be a loss of privacy to the residential dwellings to the north of the site. There are no red ratings in relation to the proposed site. There is potential for a larger scale development incorporating the Royal mail Sorting Office (DLP D H4).
DLP D H2	BT Telephone Exchange (Wolverhampton St)	Selected	The site is in a highly sustainable town centre location. Any residential development would need to be designed to ensure that there would not be loss of privacy to the residential dwellings to the north of the site. There are no red ratings in relation to the proposed site.
DLP D H5	200a Wolverhampton Street	Selected	This is a vacant brownfield site in a highly sustainable town centre location. The site is a Grade II Listed building, therefore demolition and rebuilding would not be considered appropriate, a well designed conversion, which is sympathetic to the existing heritage asset would be acceptable and a heritage statement would be needed to support any application. There are no red ratings in relation to the proposed site.
DLP S H7	36-42 Market Street	Selected	This is a vacant brownfield site in a highly sustainable location. Buildings on the site are identified as making a highly positive contributions to the area and therefore a well-designed scheme which ensure the heritage of the area is preserved and enhanced. There are no red ratings in relation to the proposed site.
SA131	Brierley Hill Police Headquarters	Rejected	The site is a currently occupied Police Station located within Brierley Hill Town Centre, adjacent to the existing Town Hall which is in use. Given the sites location adjoining the Town Hall the site due to concerns regarding the impact of noise from this adjacent use the site is rejected for residential and further assessment is required.
DLP S H2	Rolling Mills North (Part of Bradley Road East Allocation)	Selected	Vacant Brownfield site, in a highly sustainable area, The site is in close proximity to a SLINC and therefore ecological surveys will be required as part of any application.

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by Dudley MBC
			Part of the site falls within Flood Zone 3, which would need to be incorporated into any proposed layout and Flood Risk Assessment would be required.
DLP S H2	Rolling Mills South (Part of Bradley Road East Allocation)	Selected	Vacant Brownfield site, in a highly sustainable area. The site is in close proximity to a SLINC and therefore ecological surveys will be required as part of any application. Part of the site falls within Flood Zone 3, which would need to be incorporated into any proposed layout and Flood Risk Assessment would be required.
SA067	Land off Delph Lane	Rejected	With the exception of a small industrial area, the site is covered by mature trees, with a woodland order covering the site and a number of individual TPO's. The site is accessed off a small single track road which restricts access to the site and would not be suitable for residential vehicular traffic.
DLP H062	Saltwells EDC, Bowling Green Road, Netherton	Selected	Brownfield site located in a sustainable and predominately residential location. There are no red ratings in relation to the proposed site.
SA069	Site at King Street, Dudley	Rejected	The site is subject to a TPO, and its redevelopment would result in the loss of the on-site trees. The trees are in a visually prominent location and are of high amenity value within the Conservation Area. The loss of these trees would have a detrimental impact upon the amenity of the area.
SA068	Unit 17 Deepdale Works, Upper Gornal	Rejected	Whilst the site is brownfield, within a sustainable location and is located adjacent to residential development it is closely related to the existing industrial estate. The redevelopment of this individual site has the potential to prejudice the ongoing operations of these employment uses, particularly as the access to the site will continue to serve the industrial units. This is unlikely to be compatible with a residential redevelopment of the site.
DLP H059	Land at Highfields Road/Highmoor Close, Coseley	Selected	Greenfield site but is within a sustainable location within an existing residential area. There are no other red ratings in relation to the proposed site (bar its greenfield status).
DLP H040	Land adjacent 32 Whitegates Road, Coseley	Selected	Greenfield site but is within a sustainable location within an existing residential area. There are no other red ratings in relation to the proposed site (bar its greenfield status).
DLP H044	Land adjacent to Pear Tree Lane, Coseley	Selected	The site is part greenfield/part brownfield located within a sustainable and existing residential location. There is only one red rating in relation to access to secondary schools.
DLP H043	Land at Corporation Road and Cavell Road, Dudley	Selected	Greenfield site but is within a sustainable location within an existing residential area. There are no other red ratings in relation to the proposed site (bar its greenfield status).
DLP H006	Land off Ruiton Street/Colwall Road, Gornal	Selected	Greenfield site but is within a sustainable location within an existing residential area. There are no other red ratings in relation to the proposed site (bar its greenfield status).
DLP H038	Land rear of Salcombe Grove, Coseley	Selected	Greenfield site but is within a sustainable location within an existing residential area. There are no other red ratings in relation to the proposed site (bar its greenfield status).
DLP H039	Land rear of Two Gates Lane, Cradley	Selected	Greenfield site but is within a sustainable location within an existing residential area. There are no other red ratings in relation to the proposed site (bar its greenfield status).
DLP D PS1	Land at King Street/Flood Street	Selected	Brownfield site located in a sustainable and predominately residential location. There are no red ratings in relation to the proposed site.
DLP D PS2	Trindle Road/Hall Street/Portersfield	Selected	Brownfield site located in a sustainable and predominately residential location. There are no red ratings in relation to the proposed site.
DLP KQ H1	Ketley Quarry, Dudley Road, Kingswinford	Selected	Brownfield site which does hold some ecological and heritage value, but much of the sites ecological value has been lost through the remediation of the quarry.

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by Dudley MBC
DLP BH PS2	Embankments/ Daniels Lans, Brierley Hill	Selected	The site's location within the Strategic Centre, and its landform allows for potentially high rise/high density, sustainable residential development, particularly on the Daniel's Land site (to the W of the canal).
DLP BH PS1	Land at Waterfront way and Level Street	Selected	The site's location within the Strategic Centre, and its landform allows for potentially high rise/high density, sustainable residential development as part of a mix of dwelling types, which potentially also includes townhouses, particularly on the eastern part of the land north of Waterfront Way site.
DLP H053	Land off Lower Valley Road	Selected	A small residential development is likely to be accepted on this site, which doesn't project too far in to the open space. Any new developments within this site should respect the existing settlement pattern. The site is 120m from Bevan Road Industrial Estate – keeping a sufficient distance between the site boundary and the industrial estate will limit the noise impact. There are no other red ratings in relation to the proposed site (bar its greenfield status).
DLP BH H002	Waterfront Way West, Brierley Hill	Selected	Brownfield site located within sustainable location (the Waterfront Business Park, within Brierley Hill Town Centre). The site only has one red rating (access to primary school).
DLP H021	The Straits, Lower Gornal	Selected	Greenfield site with some accessibility constraints (to local services) but no significant constraints.
DLP H037	Land between Heath Road and Copse Road, Netherton	Selected	Greenfield site which is Amenity Greenspace. This site was surveyed and scored as 'low quality, low value' in the Open Space Review (2019). There are also other areas of Amenity Greenspace available nearby such as Yew Tree Hill Open Space which is approximately 124m from the site. It is also noted that many of the activities that could take place on the application site such as dog walking and running, could be carried out at Saltwells Local Nature Reserve or along the towpath of the Dudley Canal which are both close by.
DLP H058	Land at Norton Crescent, Coseley	Selected	Greenfield site (amenity space) but is within a sustainable location within an existing residential area. With the Public Open Space being of a small size, there is unlikely to be a detrimental impact to the access of the local residents to public open space. There are no other red ratings in relation to the proposed site (bar its greenfield status).
DLP BH H006	Harts Hill, Brierley Hill (Vacant land)	Selected	Brownfield site located within sustainable location nearby to existing and proposed public transport stops and Brierley Hill Town Centre. Site is mostly vacant. With any use of the site significantly scaled down it is recommended that this site is allocated for housing along with the comprehensive wider industrial site (Harts Hill Industrial Estate).
DLP BH H007	Harts Hill Industrial Estate	Selected	Brownfield site within sustainable location nearby to existing and proposed public transport stops and Brierley Hill Town Centre. While the site is of a relatively good industrial quality, surrounding uses make the site a non-conforming use.
DLP H060	Holloway Street West, Gornal	Selected	Brownfield site within sustainable location. The current use as an employment site represents a non-conforming use with the wider area being predominantly residential. There are no red ratings in relation to the proposed site.
DLP H033	North Street Industrial Estate	Selected	Brownfield site within sustainable location. There are no red ratings in relation to the proposed site.
SA003	High Farm Road, Hurst Green, Halesowen	Rejected	The site is an area of undulating Amenity Greenspace that contains a number of mature trees and is surrounded by residential development. The topography and trees would make such a small site difficult to develop. There would be a shortfall of Amenity Greenspace within this part of the borough if this site were to be developed as there are no other such sites within a 400m straight line walking distance
SA014	Playing Field off Cradley Road, Netherton	Rejected	This is a grassed area of land which is identified as an Outdoor Sports Facility despite having no sports pitches marked out. It is publicly accessible and is used informally by walkers. The site is located within Community Forum 6 'Netherton, Woodside and St Andrews, Quarry Bank and Dudley Wood' where there is a below quantity standard of playable space. The site is set at a lower level to the adjacent canal which is classed as an Area of High Historic Townscape Value and the

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by Dudley MBC
			boundaries are heavily wooded. Access onto Cradley Road is poor due to visibility issues associated with adjacent canal bridge.
SA036	Bowling Green Road, Stourbridge	Rejected	An area of Open Space not publicly accessible. The site was not audited as part of the Open Space Review (2019) however the Review noted that Community Forum 7, in which the site is located, has a below average quantity provision of open space. There is a group TPO covering all of the trees on the site. The site is being used for mitigation purposes with respect to the relocation of protected species from the adjacent site which is currently being developed for residential purposes. Vehicular access via Lion Passage is restricted in width and likely require third party land if developed.
SA042	Balfour Road, Kingswinford	Rejected	This site is an area of Amenity Greenspace that forms an attractive area of amenity land for the adjacent residents. It comprises mown grass with numerous trees and contains a path between Balfour Road and Ashdale Close. A belt of mature trees separates this site from the adjacent Dawley Brook Trading estate to the west. Most of the trading estate appears to have been built in the 1960's and does not have many (if any) restrictive planning conditions. The area should therefore be retained as it acts as a buffer between the trading estate and the residential estate. The site is narrow and elongated and has very little depth to achieve a significant amount of residential development on site. The large tree buffer along the boundary would need to be retained to help mitigate against outlook, further reducing the land available for development. The site was audited as part of the Open Space Review (2019) and found to be of 'Higher Quality and Lower Value'. Although there are other areas of Amenity Greenspace within 400m walking distance of this site, this elongated site is useful for walkers and, as a higher quality site represents one of the best areas of Amenity Greenspace in the borough.
SA044	Enville Street, Stourbridge	Rejected	This site was formerly the playing field associated with the adjacent school. The school building has now been converted to a Family Centre. It is an attractive area of grassland bounded by trees and there are also trees within the site. Although the football pitch is not marked out, the goal posts remain. There is a deficiency of public open space/playable space within the Community Forum area in which this site is located. The development of the site would also lead to the loss of a sports pitch.
SA047	Kingswinford Youth Centre, High Street, Kingswinford	Rejected	This is a publicly accessible outdoor sports facility that contains sports pitches and a community centre. It can also be used informally as an area of open space. The youth centre has been vacant for a number of years. It is located within a Community Forum Area that, according to the Open Space Review (2019) has a below quantity standard of both open space and playable space such as this. The southern part of the site has SLINC status and contains numerous trees and a BAP pond. In ecology terms therefore it would be difficult to mitigate for such loss for that part of the site. The loss of this site for residential development would remove an outdoor sports facility to the detriment of the local community.
DLPH034	Marriott Road, Netherton, DY2 0LA	Selected	This site represents a small section of a larger Local Employment Area. It contains a number of large industrial buildings and is isolated from the rest of the Local Employment Area by Marriott Road. This industrial site scored 19 in the BEAR survey which is below the required level for retention as a Local Employment Area. It is therefore considered to be suitable for housing. There are no red ratings in relation to the proposed site. Amber ratings in relation to the adjacent SLINC and potential noise issues from adjacent remaining industry may reduce developable area slightly.
DLPH035	VB at Old Wharf Road, Stourbridge	Selected	The site forms part of the larger mixed-use development allocation ref H11B.16 within the Dudley Borough Development Strategy. BEAR confirms that it can be released from its current employment use to housing. The site is adjacent to a large SHLAA site and the northern part of the site forms part of an extant planning application for outline residential development. Part of the north western section of the site has SLINC status and there is also a SLINC directly to the southern boundary of the site. The western boundary of the site is within a Conservation Area that is also an Archaeological Priority Area. The site is acceptable for housing. Ecological and tree surveys will be required to assess the quality of the boundary trees and due to the partial SLINC status of the site. Design will have to be carefully take into account the western boundary with the Conservation Area and Archaeological Priority Area. A Heritage Statement will be required. Opportunities exist to provide a well-designed development given the long western boundary of the site with the Stourbridge Canal.



Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by Dudley MBC
SA028	Dobbins Oak Road, Stourbridge	Rejected	The site provides Amenity Greenspace for the residents of the flatted development. If the Amenity Greenspace is removed the residents would lose their valuable amenity area. The southern and eastern sections of the site contain mature trees and the long hedgerow along Pedmore Lane has SLINC designation. The site is adjacent to the Green Belt and a Landscape Heritage Area to the south and east and therefore the site is sensitive in landscape terms.
SA006	Merrick Close Playing Fields, Halesowen	Rejected	Amenity Greenspace. Landlocked site which appears to have been originally used as playing fields associated with the adjacent primary school. As the site is within a Community Forum Area that falls below the quantity standard of public open space (Open Space Review 2019) the site should be retained and improved with perhaps the provision of a children's play area and some tree planting.
SA019	Sensal Road Bank, Wollescote, Stourbridge	Rejected	This is an area of Natural and Semi Natural Greenspace set within a housing estate. The Open Space Review (2019) identifies it as being of Lower Quality and Lower Value. It is accepted that the topography of the site makes it difficult to access however it contains numerous mature trees and has great potential for nesting birds and other wildlife. Although there is another area of Natural and Semi Natural Greenspace within a 400m walking distance of the site (Hodge Hole Dingle), the Open Space Review concludes that the site is within an area where there is generally a shortfall of open space.
SA021	Shavers End Road Open Space, Dudley, DY1 3DE	Rejected	This is an area of Amenity Greenspace. The topography of the majority of the site is very challenging and may make development very difficult. The site contains a significant number of trees. Whilst the Community Forum Area in which the site is located has an above quantity of open space according to the Open Space Review (2019), it is noted that there would be gap in Amenity Greenspace coverage of useable open space if the site were to be released. The nearest alternative site within 400m appears to be private land around a nursing home. The site is also adjacent to a large tower block on St James Terrace where there is limited open space, this area is therefore likely to be valuable to those residents in particular.
SA049	Central Drive Open Space, Budden Road, Coseley, WV14 8JW	Rejected	This site represents a significant area of useable Amenity Greenspace within a Community Forum Area that has a deficiency of open space. If removed it is considered that there would be insufficient coverage for this typology within the vicinity of the site as the other areas nearby are much smaller and are less useable due to topography and access constraints. The Open Space Review (2019) considers the site to be Lower Quality, Lower Value based upon the current lack of facilities, little ecological value and surrounding land uses. However, the site was identified as being attractive and its size and location provide the ability for ball games and opportunities for improvement.
SA035	Porlock Road Open Space, Porlock Road/ Mill Race Lane	Rejected	This site is a narrow green parcel of land that forms a buffer of linear open space between industry off Mill Race Lane and housing to the east. The southern section is in close proximity to the River Stour and both share SLINC status. In conjunction, they are likely to be used by wildlife as a north-south corridor. Despite scoring as a 'low quality, low value' area of open space within the Open Space Review (2019), it is clear from the well-used footpaths both definitive and non-definitive, that the site is well used by walkers. The retention of the site provides an opportunity to provide a cycle link to Stourbridge Town Centre from Route 54 (directly to the north of the site) which forms part of the National Cycle Network. A cycle/pedestrian route could also be created between Route 54 along the River Stour Corridor to Lye. This is a valuable multi-functional area of open space, with great potential to create cycle linkages to the National Cycle Network.
SA048	Land of Coombs Road, Halesowen	Rejected	The site is not suitable for housing given its location within a High-Quality Employment Area (HQEA) where there is potential for conflict, noise nuisance and air quality issues. The site is very challenging in topographical terms. This area of Natural and Semi Natural Greenspace has a positive impact for the HQEA in that it visually softens the setting of the surrounding industrial area and improves the general environment of the industrial estate. It is likely to have significant ecological value given its rather undisturbed and extensive nature and the existence of the numerous trees on the site.
SA045	High St. Wordsley Open Space	Rejected	This is an elongated piece of attractive Amenity Greenspace that occupies a prominent location at the junction of High Street/Brierley Hill Road. The eastern section is too narrow to develop. The central section provides pedestrian access and outlook for Nos 24 to 40 Brierley Hill Road. The western section is heavily wooded, and the trees are protected by a Woodland Order. The site is located within a Community Forum that has a below quantity standard and if this site were to be developed, there would be a lack of coverage of Amenity Greenspace within the vicinity of this site.

Site Reference	Site Name	Selected/ Rejected	Reason for Selection/Rejection provided by Dudley MBC
SA012	Bristol Road Open Space, Dudley	<b>Rejected</b>	The topography of this site is challenging. It is the site of a former coal pit, containing areas of coal mining high risk related to two mineshafts located on the western elevated part of the site. There is significant tree cover on the site. The site is in close proximity to the Mousesweet Brook SLINC and acts as a green corridor between the brook, via residential gardens and the school playing fields to the north. Footpaths cross the site which provide off-road routes to school between houses to the south and Netherbrook Primary School to the north of the site. In terms of the Open Space Review (2019) this site was identified as Lower quality, lower value' however, it is argued that this is a valuable and attractive area of Amenity Greenspace. It is not only part of a green corridor leading northwards from Mousesweet Brook but also serves as open space for residents of the housing to the south of the site which is much more built up and lacking open space. It is also observed that functionally, this area of Amenity Greenspace serves a different function to those nearby.
SA029	Hawbush Road Open Space, Brierley Hill	<b>Rejected</b>	The area of Amenity Greenspace is mostly wooded and forms part of a valuable green corridor between the Stourbridge Canal to the east and land to the north. In the main, the site has an elevated position with steep slopes with respect to Hawbush Road and the tree lined bank forms a prominent feature for surrounding housing to the west. The Hawbush Road frontage is the only reasonably level part of the site. The loss of this elevated small area woodland would be visually detrimental to the surrounding area.
SA013	Maggie Close Open Space, Netherton Dudley, DY2 9LU	<b>Rejected</b>	This area of Amenity greenspace serves an important role in that it acts as a buffer between the busy road junction of Halesowen Road and Cole Street which are set at a higher level to the adjacent residential development to the east. If this area were to be cleared of trees, motorists would overlook the houses which are at a much lower level and the existing residents would be more exposed to road noise and traffic fumes. If the site were to be developed for housing, due to the elevated nature of the site it would be difficult to prevent overlooking and for the new development not to look overbearing with respect to existing houses. The restricted width of the site and limited options for new access points would likely result in new development facing the road junction and thereby exposing the new residents to elevated noise levels and air pollution.
SA002	Brooksbank Drive Open Space, Cradley Heath	<b>Rejected</b>	This is an area of Natural and Semi Natural Greenspace which was once a former landfill site. It is mounded and is set at a higher level to houses in Brooksbank Drive. It is heavily wooded and forms a buffer between the residential estate and industrial buildings to the south. If developed, there would be a loss of coverage for residents in terms of this typology of open space as the nearest other areas are beyond the expected walking distance for this size of site. The site also forms part of a green corridor being in close proximity to the Mousesweet Brook on the opposite side of Gawne Lane.
SA056	Halesowen Road Open Space	<b>Rejected</b>	The whole site is an Area of Natural and Semi Natural Greenspace and is located within an area of Linear Open Space and forms part of the Dudley Canal wildlife corridor which widens at this point. The northern part of the site is an attractive, functional area of open space and should be retained as should the southern section that is heavily wooded and has SLINC status.
SA025	Orchard St. Island, Brierley Hill	<b>Rejected</b>	The site is located within an established residential area and forms an area of open Amenity Greenspace within the estate. Whilst the site has been identified as being of 'Lower Quality and Lower Value' in the Open Space Review it is the only area of Amenity Greenspace within the estate. If lost to development, the residents, particularly children, would be forced to cross the heavily trafficked Pensnett Road to use the closest area of Amenity Greenspace at Brockmoor Community Centre to the west of the site. Furthermore, the adverse impact on the existing occupiers that face the site, in terms of loss of outlook, is considered to be too great to overcome for the modest development that the site could provide.
SA051	Fullwood Crescent	<b>Rejected</b>	Grassed area surrounded by housing. Topography presents significant access difficulties and developable area of site and access. Capacity is further reduced by linear nature of site, trees, mineshafts and the PROW.
SA030	Mullett Park	<b>Rejected</b>	Area of Amenity Greenspace. The site contains goal posts and the site is of a useable size for ball games. If the pitch were to be lost from the site it is a requirement that Sport England is consulted.
SA063	Standhills Road, Kingswinford	<b>Rejected</b>	No suitable access into the site. The only access into the site would be through a neighbouring site which is not within the same ownership and there are no intentions in joining the two sites.

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by Dudley MBC
SA008	Waverley Open Space	Rejected	Whilst the Community Forum Area has a surplus of open space, there would be gap in Amenity Greenspace coverage if the site is released. Site is also a playing field. All other Open Space within 1.2km is private, bar Lister Road, but is segregated by Duncan Edwards Way.
SA046	Grey Stone St. Dudley	Rejected	Whilst the Community Forum Area has a surplus of open space, alternative Amenity Green Spaces are separated by wide roads i.e. Inhedge, have not been audited, are earmarked for development or have an uncertain future as Amenity Greenspace. Site is a key gateway into the conservation area – potential impact to setting
SA004	Alton Grove, Dudley	Rejected	Whilst the Community Forum Area has a surplus of open space, this is the only publicly accessible Natural Semi Nature Green Space within 280m, as adjoining Natural Semi Nature Green Space has no apparent public access. Access to land is not possible without third party land.
SA033	The Spinney, Brierley Hill	Rejected	Whilst the Community Forum Area has a surplus of open space this site is unsuitable for release due to access difficulties, loss of trees, levels and impact to adjoining cemetery. The site is also part of a SLINC.
SA022	Bramble Green Dudley, DY1 3TR	Rejected	Amenity Greenspace. The wider estate is designated an Area of High Historic landscape value due to the distinctive greens which are characteristic of the 1950s estate. Whilst the Community Forum Area has a surplus of open space the character of the estate which is an Area of High Historic Townscape Value would be eroded. The loss of this green would have a harmful impact on the character of the estate and AHHTV and would lead to the loss of directly supervised play.
SA023	Hazelwood Road, DY1 3TL	Rejected	Amenity Greenspace. The wider estate is designated an Area of High Historic landscape value due to the distinctive greens which are characteristic of the 1950s estate. Whilst the Community Forum Area has a surplus of open space the character of the estate which is an Area of High Historic Townscape Value would be eroded. The loss of this green would have harmful impact on character of the estate and the AHHTV and would lead to a loss of directly supervised play
SA017	Wellsbourne Drive, Coseley, WV14 9TH	Rejected	Amenity Greenspace. Adjoins Conservation Area along eastern boundary. Land on either side of Wellsbourne Drive provide an attractive entrance to the estate. Trees reduce available capacity Lane to north has a rural character.
DLPH036	Brockmoor Foundry, Leys Road, Brierley Hill, DY5 3UP	Selected	The site is located within a Local Employment Area however, subject to any potential noise issues being capable of resolution, the site is appropriate for reallocation from employment land to housing land. It is adjacent to existing allocated housing sites and therefore its continued use for employment purposes could adversely affect housing delivery on the adjacent sites. The site is adjacent to a SLINC and contains a number of trees. Relevant survey information is also required. Good design is required as the site is adjacent to the Stourbridge Canal which is an Area of High Historic Townscape Value and the southern section adjoins a Conservation Area which presents good design opportunities.
SA057	Dawson Brothers Timber, Blowers Green Crescent, Dudley	Rejected	Heavily contaminated site. It is understood that some remediation works have taken place. The stability of the site requires further investigation and remedial works. The current access to the site is substandard and it may be very difficult to achieve a satisfactory access. On this basis it is considered unsuitable for residential development.
DLPH050	National Works, Hall street, Dudley (Nuttalls)	Selected	This industrial site, which is close to existing residential dwellings, is suitable for release from industry to residential as this is supported by BEAR. The site occupies a very sustainable location close to Dudley Town Centre and a proposed Metro station. The site is located within an Area of High Historic Townscape Value which requires the retention of important features such as the office building (No. 60 Hall Street classed as a Heritage Asset) and as much of the boundary walls as possible. The elevated nature and sensitive location of the site will require a high-quality layout and design.
SA058	Dreadnought Road	Rejected	The site lies within the DY5 Enterprise Zone. The DY5 Enterprise Zone promotes employment land use within the Enterprise Zone boundary, and incentives are aimed at attracting business with reduced business rates and skills training etc. - there is also a limited amount of readily available employment land in the borough. Not suitable for residential development.
SA061	Lewis Road, Lye	Rejected	There are significant ground constraints covering the whole site which was the subject of landfill between the mid 1930's and the mid 1960's whereby there was uncontrolled tipping of domestic and putrescible waste including vegetable and animal matter. There are therefore major challenges to overcome if this site is to be developed for residential purposes.
DLPH001	Cookley Woorks, Leys Road, Brockmoor	Selected	The site has been reviewed and carried forward using a 'light touch' review process.

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by Dudley MBC
DLPH002	Land at Old Wharf Road, Stourbridge	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH003	Long Lane/ Maltmill Lane, Shell Corner	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH004	Caledonia Sewage Works	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH005	Clinic Drive, Lye	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH007	Bourne Street, Coseley	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH008	Land Adj. To 49 Highfields Road	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH009	Springfields Works, Pearson Street, Lye	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH010	Land at Plant Street, Mill street and Bridge Street, Wordsley	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH011	Leys Road/Moor Street, Brierley Hill	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH012	Quantum Works, Enville Street, Stourbridge	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH013	Balds Lane, Lye	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH014	Rufford Road, Stourbridge	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH015	Lyde Green	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH016	Land at corner of Saltwells Road and Halesowen Road, Netherton	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH017	Land off Thorns Road, Lye (North)	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH018	Bull street, Dudley	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH019	St Marks House, Brook Street	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH020	Shaw Road/ New Road, Dudley	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH022	Ridge Hill	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH023	Industrial land at Marriott Road and Cradley Road	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH024	Hayes Lane, Stour Vale Road	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH025	Land at Blowers Green Road, Dudley	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH026	Land Adj. Rear 84-86 Lyde Green, Halesowen	Selected	The site has been reviewed and carried forward using a 'light touch' review process.

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by Dudley MBC
DLPH027	Former Factory Site, Park Lane, Cradley	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH028	Former MEB Headquarters, Mucklow Hill	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH029	Foredraft Street, Cradley	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH030	Former Ibstock Works	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH031	Land at Birmingham New Road	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH032	Old Dock-Vauxhall street/ Cleveland Street, Dudley	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPH041	Hampshire House, 434 High Street, Kingswinford	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLPH042	Land rear of 294 to 364 Stourbridge Road	Selected	The site represents a vacant greenfield site. Given the existing surrounding residential development, matters relating to overlooking and amenity will need to be considered. It is noted that the site is listed in the SHLAA as a site with residential potential.
DLPH045	St Peter's Road, Netherton	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLPH046	Former New Hawne Colliery, Haysech Road, Halesowen	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLPH047	Baptist End Road, Netherton	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLPH048	Sandvik, Halesowen	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLP049	Site at Wellington Road and Dock Lane	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLPH051	Land adjacent to Nuttalls	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLPH052	Derelict building opposite 206 to 218 Moor Street	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLPH054	Former Recycling Site, Moor Street	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLPH055	Vacant Land at Darkhouse Lane	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLPH056	Fiddlers Arms, 16 Straits Road	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLPH057	Pens Meadow School, Ridge hill	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLPH061	Church Road, Netherton	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLP BH H001	Land at Moor Street	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP BH H003	Canal Walk South (referred to as Mill Street)	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP BH H004	Level Street/ Old Bush Street	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP BH H008	Car Park at Oak Court, Dudley Road	Selected	The site has been reviewed and carried forward using a 'light touch' review process.

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by Dudley MBC
DLP BH H009	Old Carriage Works, Mill Street	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP BH 010	Land Bell Street, High Street	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP S H1	Enville Street	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP D H6	Ednam House, 1 Ednam Road	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLP S H3	Bradley Road (West)	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP D H7	Tipton Road – Land adjacent to Black Country Museum	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP D H8	Gypsies Tent Publics House	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP S H4	64-67 High Street, Stourbridge	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLP S H5	Peugeot Garage, Hagley Road	Selected	A light touch review approach has been applied to brownfield housing sites through the SHLAA process.
DLP S H6	Titan Works, Old Wharf Road	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP D H9	Former Appleyards Site, Wolverhampton	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
SA072	Canal Walk North	Rejected	Site is impacted by the future Metro Development and surrounded by heavy employment uses.
SA076	Blowers Green Road, Dudley, DY8 8UT	Rejected	The site is a former cemetery with human remains buried on the site, in addition the loss of the site as amenity space would result in a loss of amenity greenspace within the area.
SA132	Eve Lane, Dudley	Rejected	Site is part of dark bat corridor.
SA080	Land off Anchor Hill, Delph Road	Rejected	A planning application for an alternative use to residential has been received, indicating there is not a willing landowner on the site. It is therefore considered the site is not suitable for residential development.

**Table 7.16:** Outline reasons for selection and rejection of reasonable alternative sites: Mixed-Use

Site Reference	Site Name	Selected/Rejected	Reason for Selection/Rejection provided by Dudley MBC
DLP BH OS1	Brierley Hill Civic Core	Selected	A light touch review approach has been applied to the site through the 2022 Brierley Hill Plan Issues and Options Consultation.
DLP BH OS2	The Waterfront East Entertainment Zone	Selected	A light touch review approach has been applied to the site through the 2022 Brierley Hill Plan Issues and Options Consultation.
DLP BH OS3	The Venture Way Health and Education	Selected	A light touch review approach has been applied to the site through the 2022 Brierley Hill Plan Issues and Options Consultation.
DLP S OS1	North of Birmingham Street	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP S OS2	Mill Race Lane	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP S OS3	Rye Market	Selected	The site is a brownfield site, located in a highly sustainable town centre location and would be suitable for residential as part of a mixed-use scheme, retaining some public parking. There are no red ratings in relation to the proposed site.
DLP D OS1	Tower Street/ Castle Street	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP D OS2	Trident Centre/ Upper High Street	Selected	The site has been reviewed and carried forward using a 'light touch' review process.

Site Reference	Site Name	Selected/ Rejected	Reason for Selection/Rejection provided by Dudley MBC
DLP D OS3	Upper High Street/ King Street	<b>Selected</b>	The site has been reviewed and carried forward using a 'light touch' review process.
DLP D OS4	Abberley Street/ King Street	<b>Selected</b>	The site has been reviewed and carried forward using a 'light touch' review process.
DLP H OS1	Trinity Point	<b>Selected</b>	The site has been reviewed and carried forward using a 'light touch' review process.
DLP H OS2	Link House and Pioneer House	<b>Selected</b>	The site has been reviewed and carried forward using a 'light touch' review process.
DLP H OS3	Little Cornbow	<b>Selected</b>	The site has been reviewed and carried forward using a 'light touch' review process.
DLP H OS4	Fountain House	<b>Selected</b>	The site has been reviewed and carried forward using a 'light touch' review process.
DLP H OS5	Pool Road Car Park	<b>Selected</b>	The site has been reviewed and carried forward using a 'light touch' review process.

**Table 7.17:** Outline reasons for selection and rejection of reasonable alternative sites: Employment

Site Reference	Site Name	Selected/ Rejected	Reason for Selection/Rejection provided by Dudley MBC
DLPE01	Fountain Lane	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPE02	Moor Street Freight Depot	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPE03	Tansey Green Road (South)	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPE04	Hillcrest Business Park, New Road, Dudley	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPE05	Narrowboat Way	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPE06	Steelpark Road, Halesowen	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPE08	Westminster Industrial Estate, Cradley Road, Netherton	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLPE09	Land off Amber Way, Coombeswood Industrial Park	Selected	The site comprises an underutilised space within an existing high quality employment area, the site has good connections to nearby motorways. There are no red ratings in relation to the proposed site (another than its location outside a regeneration corridor).
SA070	Former Filmex Ltd, rear of Park Lane Tavern, Park Lane	Rejected	Site is within existing employment area and represents underutilised space. However, there is no clear highway access point.
DLP E10	Land adjacent to railway, Pedmore Road (Blackbrook Salvage)	Selected	The site currently comprises an underutilised site within an existing high quality employment area. The site does appear to have an established access point. There are no red ratings in relation to the proposed site.
DLP E11	Hardstanding area to south, Silver End Trading Estate	Selected	Site is within existing employment area and represents underutilised space. Red rating (land contamination) but these are not considered to be overriding constraints to the development.
DLP E12	Land off Timmis Road, Lye	Selected	This site is an existing employment opportunity site with a live permission for employment redevelopment. There are no red ratings in relation to the proposed site.
DLP E13	Coopers Bank, Gornal	Selected	The site is a vacant/underutilised portion of an existing standalone industrial unit. The site is not located within an existing or proposed regeneration corridor and is partly impacted by some heritage assets; however, it is likely that development can still take place with appropriate mitigation. There are no red ratings in relation to the proposed site (another than its location outside a regeneration corridor).
DLP E14	Gibbons Industrial Park, Pensnett	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP E15	Hulbert Drive, Blackbrook Valley	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP E16	Grazebrook Park, Blackbrook Valley	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
SA059	Land at Bott Lane, Lye, Stourbridge	Rejected	Previous site assessment scored the site under the threshold for a local employment area designation.



Site Reference	Site Name	Selected/ Rejected	Reason for Selection/Rejection provided by Dudley MBC
DLPE07	Bean Road Cosley	Selected	The site is not coming forward for housing due to landowner aspiration to retain for employment use and no prospect of coming forward during plan period.
SA073	BHAAP Development Opportunity Block W7	Rejected	Site is likely to be required for metro extension development.
SA074	BHAAP Development Opportunity Block W8	Rejected	Site is likely to be required for metro extension development.

**Table 7.18:** Outline reasons for selection and rejection of reasonable alternative sites: Gypsy and Traveller

Site Reference	Site Name	Selected/ Rejected	Reason for Selection/Rejection provided by Dudley MBC
DLP GT001	Delph Lane	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP GT002	Holbeache Lane, Wall Heath	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP GT003	Dudley Road, Lye	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP GT004	Smithy Lane	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP GT005	Oak Lane	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
DLP GT006	Saltbrook Scrapyard, Saltbrook Road, Halesowen	Selected	The site has been reviewed and carried forward using a 'light touch' review process.
SA GT016	Birmingham Street, Stourbridge	Rejected	The site is close to industrial units and currently services as access and waiting area to the adjacent waste site.
SA GT018	Saltwells Road (Corporate Landlord Services)	Rejected	The site is a designated SLINC, and is covered in mature trees. Any development of the site would result in the loss of these trees and significant harm to the SLINC. It is therefore considered that the site should not be allocated.
SA GT008	Land at Higgins Avenue, Harding Street, Coseley	Rejected	Greenfield site representing Public Open Space (former colliery). The Community Forum in which the site is located was assess within the Open Space Review as having a below quantity standard for Public Open Space. Issues regarding site stability and access to the site.
SA GT009	Budden Road, Coseley	Rejected	Part of the site is currently in use as a permanent transit site (southeast of site), with the remaining part of site being a Low Quality Low Value area or Amenity Green Space. The Community Forum in which the site is located was assess within the Open Space Review as having a below quantity standard for Public Open Space. Potential issues relating to ground stability and contamination. Site should remain as a part permanent transit site and part amenity greenspace.
SA GT010	Waverley Street Open Space, Dudley	Rejected	Whilst the Community Forum Area has a surplus of open space, there would be gap in Amenity Greenspace coverage if the site is released. Site is also a playing field. Potential or suspected contamination issues. The site contains a cycleway that links southward to Parkhead Locks are of Natural and Semi Natural Greenspace and the Dudley Canals and also links northwards along the Stourbridge Road towards Dudley Town Centre.
SA GT011	Land rear and next to the Oakfield Centre, Wordsley	Rejected	Part of the site represents allotments which would need to be excluded from the developable area.

Site Reference	Site Name	Selected/ Rejected	Reason for Selection/Rejection provided by Dudley MBC
			Access to the site may require removal of mature trees and there is the potential for vehicle conflict due to the relationship of a new access to the site and existing junctions. Topography of the site could limit the site capacity and layout options (slopes from south to north). These factors reduce the potential developable area/site capacity and are likely to make the site unviable.
SA GT014	Bristol Road, Dudley	<b>Rejected</b>	Access options are restricted. The topography of the site, existing Public Rights of Way and mature trees substantially reduce the developable area and limit the potential to accommodate manoeuvring space for large vehicles or space for storage/maintenance of equipment and vehicles.
SA GT019	Bank Street Playing Field	<b>Rejected</b>	Site continues to operate as a car park, which significantly reduces the developable area and restricts access to the remainder of the site. Access and topography issues limit potential to accommodate manoeuvring space for large vehicles or space for storage/maintenance of equipment and vehicles.
SA GT020	Merrick Close Playing Fields, Halesowen	<b>Rejected</b>	Restricted access.
SA GT021	Caledonia/Bagleys Road	<b>Rejected</b>	SINC and TPO order.
SA GT007	Vacant Car Park, Waterfront Way, Brierley Hill	<b>Rejected</b>	Site is more suitable for residential and has been allocated for housing.
SA GT012	Blowers Green Road, Dudley	<b>Rejected</b>	The site is currently an operating waste facility, with a number of industrial operations surrounding the site. It is considered that the site is not currently suitable for release.
SA GT013	Old Dudley leisure Centre	<b>Rejected</b>	While the site is located in a relatively sustainable location, it is recommended that this site is rejected as a Gypsy and Traveller site given that it is a proposed residential allocation within the draft DLP.
SA GT015	Land rear of Two Gates Lane, Cradley	<b>Rejected</b>	Given that the site is an existing public open space/playing field, it is considered that the sites release for use as a Gypsy and Traveller site is not appropriate.
SA GT017	Clinic Drive Lye	<b>Rejected</b>	Site is more suitable for residential and has been allocated for housing.

# 8 Recommendations

## 8.1 Overview

8.1.1 Lepus has prepared a list of recommendations for DMBC to consider as the DLP progresses, including specific recommendations for policies (as referred to in **Appendices D and E**), as well as more general recommendations for the DLP and overall spatial strategy (see Table 8.1). These recommendations are not exhaustive. Further recommendations will be provided where appropriate throughout the plan making process.

**Table 8.1:** SA Recommendations for the proposed Dudley Local Plan policies

SA Objective	SA Recommendations
1: Cultural Heritage	<ul style="list-style-type: none"> <li>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.</li> <li>It is recommended to use the word “conserve” rather than “preserve” when relating to cultural heritage, reflecting the wording from the NPPF.</li> <li>The Council could consider merging Policies DLP59 (AHHTV) and DLP60 (AHHLV) into one policy to provide a clear position for AHHTVs and AHHLVs and to ensure consistent policy measures. In general, several of the historic environment policies could be merged to set out clear requirements for the conservation and enhancement of designated and non-designated heritage assets.</li> <li>Ensure that site allocation policies require Heritage Impact Assessments to inform the development and to assess whether the principle of development is acceptable and identify any appropriate mitigation / enhancement opportunities, in line with Historic England’s advice.</li> <li>The spatial strategy policies should include wording to promote heritage-led regeneration which ensures the conservation and enhancement of the historic environment.</li> </ul>
2: Landscape	<ul style="list-style-type: none"> <li>Ensure development proposals are constructed in accordance with appropriate design guides and codes, including the ‘Design: process and tools’<sup>36</sup> government guidance.</li> <li>DLP policies should support development in accordance with the findings of the Landscape Sensitivity Assessment<sup>37</sup> prepared for the former BCP, or any future updates.</li> <li>Site allocation policies, particularly those proposing high densities of development, should ensure that development layout and design is informed by a Landscape and Visual Impact Assessment (LVIA) / Landscape Visual Appraisal (LVA).</li> <li>Development proposals should aim to protect areas identified as tranquil. An example method for identifying tranquility includes ‘Mapping Tranquility’<sup>38</sup>.</li> <li>Policy tools could be incorporated to set out the quantitative and qualitative requirements for informal / natural green space / GI in new developments, for example, using Natural England’s Accessible Natural Greenspace Standard<sup>39</sup>.</li> </ul>

<sup>36</sup> MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date accessed: 18/08/23]

<sup>37</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> [Date accessed: 18/08/23]

<sup>38</sup> CPRE (2005) Mapping Tranquility. Available at: <https://www.cpre.org.uk/resources/mapping-tranquility/> [Date accessed: 18/08/23]

<sup>39</sup> Natural England (2003) Accessible Natural Green Space Standards in Towns and Cities. Available at: <http://publications.naturalengland.org.uk/publication/65021> [Date accessed: 18/08/23]

SA Objective	SA Recommendations
	<ul style="list-style-type: none"> <li>To supplement emerging DLP policies regarding GI, DMBC could consider commissioning a GI Strategy, with potential to incorporate the principles of Natural England's emerging GI Framework<sup>40</sup>.</li> <li>In considering design aspirations, the principles of the 2020 'Building Better, Building Beautiful' report<sup>41</sup> should be embraced. There are three pillars to the approach advocated in this report: <i>"ask for beauty, refuse ugliness and promote stewardship"</i>.</li> </ul>
3: Biodiversity, flora, fauna and geodiversity	<ul style="list-style-type: none"> <li>Policy DLP31 (Nature Conservation) should take into account the findings of the HRA when available.</li> <li>The DLP should embed the principle of improving resilience and connectivity of biodiversity sites through landscape scale management, recognising the potential to deliver wider benefits to natural capital and ecosystem services.</li> <li>The DLP should seek opportunities to improve the resilience of the ecological network through increased quantity of habitat and enhanced connectivity, based on an evidenced landscape-scale approach. Consideration should be given to how BNG can be most effectively delivered to link up with the emerging Local Nature Recovery Network and the current locally designated sites, as well as the England Tree Action Plan.</li> <li>The biodiversity value of watercourses including the canal network should be acknowledged and the DLP policies could incorporate wording to ensure that the ecological and chemical status of waterbodies is considered, and opportunities to improve the status are sought.</li> <li>It is recommended that wording is added to Policy DLP BH4 (Green Infrastructure in Brierley Hill) and other relevant GI policies to ensure that the newly planted trees will be preferably native species and that the location of trees is informed by an assessment carried out by a qualified ecologist / arboriculturist. The long-term management of the trees should be ensured.</li> </ul>
4: Climate change mitigation	<ul style="list-style-type: none"> <li>Where appropriate, site-specific Transport Plans should be prepared. All developments should protect and enhance public space to encourage safe walking and cycling opportunities.</li> <li>The DLP should seek to ensure that all new residential and commercial developments support the move to zero carbon.</li> <li>All development proposals should aim to exceed the standards set out in the Building Regulations<sup>42</sup>. Consideration should be given to retrofitting of existing building stock, including energy efficiency upgrades to historic buildings.</li> <li>Wherever possible, the DLP should seek to promote and encourage the generation and use of renewable and low-carbon energy and associated infrastructure. DMBC should provide a positive strategy to achieve this, whilst also ensuring that any adverse impacts, including cumulative impacts, of potential energy schemes are addressed.</li> <li>It is recommended that a Climate Change Strategy is prepared. This could also help to identify the carbon capture and storage potential of the Plan area.</li> <li>As part of additional supporting evidence for the DLP, DMBC could consider commissioning a climate change study and calculating / reporting on GHG emissions in greater detail. This could include use of the Greenhouse Gas Accounting Tool<sup>43</sup>. More detailed carbon footprint data for the plan area would enable the SA process to evaluate changes to carbon emissions as a consequence of the plan in terms of (a) evolution of</li> </ul>

<sup>40</sup> Natural England (2023) Introduction to the Green Infrastructure Framework – Principles and Standards for England. Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx> [Date accessed: 18/08/23]

<sup>41</sup> MHCLG (2020) Living with Beauty: Promoting health, well-being and sustainable growth: The report of the Building Better, Building Beautiful Commission. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/861832/Living\\_with\\_beauty\\_BBBBC\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBBC_report.pdf) [Date accessed: 18/08/23]

<sup>42</sup> MHCLG (2016) Building Regulations: Approved Document. Available at: <https://www.gov.uk/government/collections/approved-documents> [Date accessed: 18/08/23]

<sup>43</sup> Local Partnerships (2023) Greenhouse Gas Accounting Tool and Waste Emissions Calculator. Available at: <https://localpartnerships.org.uk/greenhouse-gas-accounting-tool/> [Date accessed: 18/08/23]

SA Objective	SA Recommendations
	the baseline without the plan, and (b) effect on climate change through increased or decreased emissions, with the plan.
5: Climate change adaptation	<ul style="list-style-type: none"> <li>Using relevant data sources, ensure development proposals incorporate green and blue infrastructure where appropriate.</li> <li>Ensure development proposals do not result in the exacerbation of surface water flood risk in surrounding areas.</li> <li>Development proposals should be built in accordance with the relevant Surface Water Management Plan<sup>44</sup>. It is recommended that the Black County Surface Water Management Plan is updated.</li> <li>The effects of regional climate change projections (e.g. Met Office UKCP projections<sup>45</sup>) on cross-cutting themes such as flood risk, biodiversity, air quality, landscape, heritage and mobilisation of contaminants should be taken into consideration in terms of the inter-relationship of effects and the requirement to assess climate change adaptability of developments.</li> <li>Different approaches to heat decarbonisation and the removal of gas boilers (as advocated under the Future Homes Standard<sup>46</sup>), should be promoted through the DLP including consideration of district heating network connections and / or heat pumps. Opportunities to promote Passivhaus buildings<sup>47</sup> should be considered.</li> </ul>
6: Natural resources	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>Ensure development proposals on contaminated land are only permitted where it can be demonstrated that the contamination can be effectively managed or remediated so that it is appropriate for the proposed use.</li> </ul>
7: Pollution	<ul style="list-style-type: none"> <li>Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality or for air quality monitoring.</li> <li>Development should take into consideration recommendations within the relevant Air Quality Action Plan and the outputs of the Annual Status Reports.</li> <li>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.</li> <li>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.</li> <li>Development proposals should be built in accordance with recommendations within the Water Cycle Study<sup>48</sup> 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.</li> <li>DLP policies should seek to ensure development proposals are designed in order to avoid any significant adverse impacts from pollution, including cumulative impacts, on human health and wellbeing, biodiversity, the effective operation of neighbouring land uses and the water environment.</li> <li>Ensure an 8m minimum easement between built development and rivers.</li> </ul>

<sup>44</sup> 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](https://blackcountryplan.dudley.gov.uk/media/11668/water_cycle_study_scoping_surface_water_mgmnt_plan.pdf) [Date accessed: 18/08/23]

<sup>45</sup> Met Office UK Climate Projections (UKCP). Available at: <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp> [Date accessed: 18/08/23]

<sup>46</sup> Available at: <https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings> [Date accessed: 18/08/23]

<sup>47</sup> Passivhaus Trust. Available at: <https://www.passivhaustrust.org.uk/> [Date accessed: 25/08/23]

<sup>48</sup> JBA (2020) Black Country Councils Water Cycle Study: Phase 1 Scoping Study. Final, May 2020. Available at: [https://blackcountryplan.dudley.gov.uk/media/17929/watercyclestudy\\_phs1\\_scopingstudy.pdf](https://blackcountryplan.dudley.gov.uk/media/17929/watercyclestudy_phs1_scopingstudy.pdf) [Date accessed: 12/09/23]

SA Objective	SA Recommendations
8: Waste	<ul style="list-style-type: none"> <li>The DLP should take into account the findings of the Black Country Waste Study<sup>49</sup> and subsequent Update<sup>50</sup> and other relevant evidence base documents (including the emerging Dudley Borough Waste Study) to ensure that waste management and recovery facilities are appropriately located, and will facilitate moving waste up the hierarchy to enable communities to take more responsibility for waste arising in their areas.</li> <li>Seek to achieve no biodegradable waste to landfill to reduce emissions, in line with 'Net Zero the UK's contribution to stopping global warming'.</li> <li>Development proposals should demonstrate measures to minimise waste generation during construction.</li> <li>Development proposals should integrate well-designated waste storage space to facilitate effective waste storage, recycling and composting.</li> </ul>
9: Transport and accessibility	<ul style="list-style-type: none"> <li>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.</li> <li>Stronger reference to prioritising sustainable travel including public transport and active travel in order to facilitate a modal shift away from private car use within Policy DLP3 (Areas outside the Growth Network) would benefit the policy.</li> <li>Improving connectivity of active travel routes should be a priority, owing to the severance of many routes due to the landscape / townscape being dominated by the highway networks discouraging use.</li> </ul>
10: Housing	<ul style="list-style-type: none"> <li>Ensure all development proposals are built to a high-quality design in line with the 'Design: process and tools'<sup>51</sup> government guidance.</li> <li>High density development can play a role in making the best use of available land, particularly in highly urbanised authorities. However, such developments will require careful co-ordination and planning to ensure that potential adverse effects are identified and avoided, for example on townscape character, capacity of local services and transport networks, loss of open spaces, urban heat island effects and 'canyoning' resulting from changing wind patterns.</li> </ul>
11: Equality	<ul style="list-style-type: none"> <li>Ensure residential development proposals incorporate functional private or communal open space, including green space.</li> <li>Ensure development proposals provide adequate indoor space in line with, or beyond, the requirements set out in the technical housing standards<sup>52</sup>.</li> <li>Where appropriate, consider the option for community ownership of some facilities and services.</li> <li>Ensure development proposals promote social interaction, including the establishment of strong neighbourhood centres.</li> <li>It is recommended that an Equality Impact Assessment of the DLP is prepared.</li> <li>Ensure development proposals promote safe and accessible neighbourhoods, helping to reduce crime and the fear of crime.</li> </ul>

<sup>49</sup> Wood (2020) Black Country Waste Study – Review of the Evidence Base for Waste to support Preparation of the Black Country Plan Revised Final Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report_redacted.pdf) [Date accessed: 18/08/23]

<sup>50</sup> Wood (2022) Black Country Waste Study Update: Updated waste needs assessment to support preparation of the Black Country Plan. September 2022. Available at: [https://www.sandwell.gov.uk/downloads/download/2966/bcp\\_-\\_new\\_evidence](https://www.sandwell.gov.uk/downloads/download/2966/bcp_-_new_evidence) [Date accessed: 12/09/23]

<sup>51</sup> MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date accessed: 18/08/23]

<sup>52</sup> 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](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: 18/08/23]

SA Objective	SA Recommendations
	<ul style="list-style-type: none"> <li>The DLP policies should ensure that the layout and design of proposed sites for Gypsies, Travellers and Travelling Showpeople is carefully considered with reference to good practice guidance<sup>53</sup>.</li> </ul>
12: Health	<ul style="list-style-type: none"> <li>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.</li> <li>It is recommended that a Health Impact Assessment of the DLP is prepared.</li> <li>Improve or enhance the PRoW and cycle network across the Plan area. It is recommended that the Rights of Way Improvement Plan is updated.</li> <li>Development proposals should be in accordance with the relevant Open or Green Space Strategy. The DLP should provide or improve safe pedestrian and cycle access to public greenspaces and open spaces.</li> <li>Ensure development proposals do not result in detrimental impacts to the safety of pedestrians and cyclists.</li> <li>Where new active travel links are to be provided, these should be well designed so vulnerable groups can travel in confidence; this could include consideration of lighting schemes, overlooking and appropriate vegetation to avoid concealed spaces.</li> </ul>
13: Economy	<ul style="list-style-type: none"> <li>Ensure residential-led proposals are located in close proximity to sustainable transport options to reach employment opportunities, and that new employment developments consider how to encourage access via public transport or active travel over the use of private cars.</li> <li>Opportunities should be explored in the DLP policies to achieve smart economic growth. This could be encouraged through the use of technology and innovative ways of working to increase productivity without damaging people's quality of life or the environment.</li> <li>Ensure development proposals for employment-led use cumulatively meet the identified employment needs of the Plan area. This should be in accordance with the latest Economic Development Needs Assessment (EDNA), and subsequent reviews.</li> </ul>
14: Education	<ul style="list-style-type: none"> <li>Increase the provision and capacity of primary and secondary schools across the Plan area in line with the identified need.</li> </ul>

<sup>53</sup> Communities and Local Government (2008) Designing Gypsy and Traveller Sites: Good Practice Guide. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/11439/designinggypsiesites.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsiesites.pdf) [Date accessed: 18/08/23]

## 9 Conclusions and next steps

### 9.1 Consultation on the Regulation 18 SA Report

- 9.1.1 This Regulation 18 SA Report is subject to consultation with statutory consultees, stakeholders and the general public alongside the Draft Dudley Local Plan documents.
- 9.1.2 This report represents the latest stage of the SA process. The SA process will take on board any comments on this report and use them to inform future SA outputs.

### 9.2 Responding to the consultation

- 9.2.1 This Regulation 18 SA Report will be published by DMBC for consultation. Consultation findings will be used to inform subsequent stages of the SA process.
- 9.2.2 All responses on this consultation exercise should be sent to:

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Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

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Ecological Impact Assessments

Habitat and Ecology Surveys



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