

Appendix 2

Brierley Hill Plan Issues and Options Report
(Brierley Hill Area Action Plan review)

Sustainability Appraisal

December 2021

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Chapter 1: Non-technical Summary

Introduction

1. Dudley Council are progressing a new Local Plan document, the Brierley Hill Plan (BHP), for Brierley Hill Strategic Centre. This new plan will guide development and enable the regeneration of the centre up to 2039. The BHP is part of the Local Development Scheme (LDS) and is a review of the Brierley Hill Area Action Plan (AAP) (2011).
2. The National Planning Policy Framework (2021) (NPPF) requires Local Planning Authorities (LPA), through their Local Plans, to adopt policies and site allocations which achieve the objective of delivering sustainable development: to ensure that the development takes place in a sustainable way, which means balancing social, economic and environmental needs both now and in the future. The means by which draft local plans' policies are assessed in order to achieve this objective is through a Sustainability Appraisal (SA). An SA has therefore been undertaken on the BHP. SA relates to the requirements of the NPPF (2021), as paragraph 32 states:

“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addresses relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts mitigation should be proposed (or, where is nor possible, compensatory measures should be considered)”.

3. The BHP is subject to a Sustainability Appraisal in order to assess the plans effects on sustainability issues. This report sets out an assessment of the Issues and Options stage. The results of this assessment will be used by the council when drafting the next stages of the plan.

Brierley Hill Plan

4. BHP Area is located within Brierley Hill Ward, which has a population of 15,164(2019) Brierley Hill is a heavily industrialised area within Dudley Borough and the Black Country. It is located 2.5miles south west of Dudley Town Centre, and 8 miles west of Birmingham.
5. The council have prepared an Issues and Options Consultation Report, This report identifies key issues, challenges and opportunities facing the area, and sets out different options to address those issues.

Sustainability Appraisal

6. When preparing Development Plan Documents, such as the BHP Local Planning Authorities must also conduct a Strategic Environment Assessment (SEA) in accordance with the requirements of European Directive 2001/42/EC. This assessment is a systematic process for evaluating the environmental consequences of proposed policies, plans or programmes to ensure that environmental issues are fully integrated and addressed at the earliest appropriate stage of decision making. Sustainability Appraisals are broader and promote sustainable development through the integration of environmental, social, and economic considerations into the plan's preparation. As a result, the SA for the Issues and Options Report has therefore incorporated the requirements of the "Environmental Assessment of Plans and Programmes Regulations 2004". Throughout this document, where reference is made to the SA Report, it denotes Sustainability Appraisal under the act, incorporating the requirements of Strategic Environmental Assessment (SEA) Directive.
7. In terms of appraising the options set out in the BHP Issues and Options Report, the strategic objectives were initially tested against the SA framework, which relates to 14 sustainability objectives, as identified in the scoping report. It needs to be emphasised that the BHP is being drafted within a wider strategic planning framework, taking into account the objectives and policies within the adopted Dudley Borough Development Strategy and the emerging Black Country Plan.
8. The sustainability objectives which represent the SA framework, are highlighted below, and concern environmental, economic, and social considerations. Table 1 identifies the sustainability objective chosen and whether it is considered to address the full cross section of sustainability issues, under the broad headings of environmental, social, and economic factors. The topics in bold cover SA topics and those in brackets cover the SEA topics.

Table 1: SA Objectives

SA Objective		Economic	Environmental	Social
1	Health (Human Health and Population) To improve the health and well-being of the Brierley Hill community, including ensuring that health, education, leisure, and recreational resources, as well as in-centre services and facilities and job opportunities are easily accessible both for existing and future residents.	✓	✓	✓
2	Climate Change Adaption. (Climate Change) To have a plan-based approach to address Climate Change, plan for the anticipated levels of Climate Change, and reduce and manage the impacts of climate change within Brierley Hill.		✓	✓
3	Transportation and Accessibility. (Material Assets) To reduce traffic congestion and pollution by improving the efficiency of existing transport networks and by increasing the proportion of travel by sustainable modes, including cycling, walking, and public transport, and by promoting policies which reduce the need to travel	✓	✓	✓
4	Housing (Material Assets and Population) To improve access to a range of good quality, affordable and resource efficient and environmentally sound housing, including the delivery of a significant number of new homes, which meets the needs of all of Brierley Hill's existing and future residents	✓	✓	✓
5	Equality and Social Inclusion. (Population) To develop a stronger, more resilient and vibrant Brierley Hill community, encourage social cohesion and interaction, reduce poverty, social deprivation and crime and the fear of crime.	✓		✓
6	Economic Development (Population) To enhance the sense of place, vitality and viability of the plan area, with particular focus on the centres contained within it.	✓	✓	✓

7	Economic Development. (Population) To develop a dynamic, diverse and, in particular, knowledge-based economy that excels in innovation with higher value, lower impact activities, and provides for sustainable economic growth.	✓		✓
8	Heritage. (Cultural Heritage and Landscape) To protect and enhance and manage Brierley Hill's rich and diverse, historic, cultural and built environment and archaeological assets, and their settings, maintaining and strengthening and its local character, distinctiveness, and special qualities.	✓	✓	✓
9	Use of Resources (Material assets, soil and water) To promote sustainable energy use through improved efficiency reduced energy use and increased use of renewable energy in particular.	✓	✓	
10	Environmental Quality. (Air, Soil, Water and Human Health) To reduce air, water, soil, light and noise pollution level.	✓	✓	✓
11	Biodiversity. (Biodiversity, Flora and Fauna) To protect, enhance and conserve biodiversity and sites of geological importance avoiding irreversible losses, through responsible management and enhancement of these sites, and by encouraging greater accessibility and community ownership and patronage.		✓	✓
12	Use of Resources. (Material assets, soil and water) To reduce and manage flood risk and surface water run-off, protect and enhance water quality, and encourage water conservation.	✓	✓	✓
13	Use of Resources. (Materials assets, soil and water) To maximise the use of previously developed land and buildings, and generally enabling development to be delivered which makes the efficient use of brownfield land.	✓	✓	

14	Waste. (Material Assets) To promote sustainable waste management, including reducing waste generation and waste disposal, promoting recovery, re-use and recycling.		✓	✓
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9. The framework was developed from an analysis of the relevant plans, programmes and data on the environmental, economic, and social issues affecting the strategic town centre. The options presented in the BHP Issues and Options Report have been assessed against these SA objectives to determine whether it positively relates to each sustainability objective

Conclusion

10. Options and policy areas are assessed to determine whether they are supported or conflicting with each sustainability objective and the extent of the impact and how this may change over time. In general, it is concluded that:-
- Retail led regeneration within the plan area will have a multitude of economic benefits;
 - environmental improvements will be delivered, in particular through the application of a green infrastructure focused approach;
 - social benefits will be delivered through job creation, affordable housing provision and easy and equitable access to services;
 - In some instances, economic development may conflict with environmental objectives, however, when this occurs mitigation and enhancement packages will be incorporated to minimise such impacts.

Chapter 2: Introduction

Background

1. Dudley Council is preparing the BHP for Brierley Hill Strategic Centre, as a review of the Brierley Hill Area Action Plan (AAP) (2011). The existing AAP plan area boundary may change following the adoption of the BHP. The council is required to produce a Local Development Framework (LDF) under the planning system, as one of the requirements of the Planning and Compulsory Purchase Act 2004 (amended 2008). Further information on the different types of Local Development Plan Documents, Supplementary Planning Documents and Area Actions Plans can be found in Dudley's Local Development Scheme (LDS) available on the Council's website at: <https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/local-development-scheme/>
2. The BHP will guide the development in the area up to 2039. The intentions of this plan are to create an area with a mix of new homes, retail, employment uses, as well as community and leisure facilities that meet the needs of residents and businesses in the area, as well as visitors. This is also an opportunity to improve accessibility to and within the strategic centre, create a vibrant and thriving centre and make positive improvements to the overall environment in the area.
3. It is a Government requirement, under regulation 39 of the Planning and Compulsory Purchase Act 2004 to carry out Sustainability Appraisals (SA) for Development Plan Documents. Subsequent Government Guidance on Sustainability Appraisal has provided local authorities with details of what is required to undertake a sound and robust sustainability appraisal.
4. The SA is the process of informing and influencing the development of the BHP to help ensure the plan enables sustainable development to be achieved.

Brierley Hill

5. Brierley Hill is a heavily industrialised area, within the Dudley Borough, located within the Black Country. Brierley Hill is the designated Strategic Centre of Dudley Borough located 2 miles north of Stourbridge Town Centre, 2.5 miles South West of Dudley Town Centre and 8 miles west of Birmingham. Brierley Hill Ward covers an area of 434ha with a population of 15,050.
6. Brierley Hill became heavily industrialised during the Victorian period, however from the 1970s there has been long-term decline in local manufacturing resulting in a reduction in local spending within Brierley Hill, specifically the High Street. Merry Hill Shopping Centre and The Waterfront office park were developed following the designation of an enterprise zone during the mid-

1980's, with a second enterprise zone being designate in 2017 (DY5 EZ). Sites of local, national, and international importance for nature conservation are located within and near Brierley Hill, including the nearby Fen Pool Special Area of Conservation (SAC) and Saltwells National Nature Reserve (NNR)

The Brierley Hill Plan

7. The BHP will be the development plan for determining future planning applications within the plan area. The plan will set out
 - A vision for the area
 - Objectives to achieve this vision
 - Policies and proposals to guide future development
 - Identify where future development will take place by allocating sites for appropriate land uses.
8. The BHP is a review of the existing Brierley Hill Area Action Plan. It will also complement and be consistent with strategic policies and proposals within the adopted Dudley Borough Development Strategy and the emerging Black Country Plan.

SEA Requirements

9. The European Directive 2001/42/EC (the SEA Directive) “on the assessment of the effects of certain plans and programmes on the environment” requires a formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment. The SEA Directive is transformed into UK Law by the Environmental Assessment (EA) of Plans and Programmes Regulations 2004.

Sustainability Appraisal of the Issues and Options Report for the Brierley Hill Plan

10. The purpose of the sustainability appraisal is to promote sustainable development through the plan making process. It is a key tool used to appraise the environmental, economic, and social effects of plans, strategies, and policies. It is about making sure the effects of implementing a plan are considered at an early stage.
11. Section 19 (5a and 5b) of the Planning and Compulsory Purchase Act (2004) states that local planning authorities must carry out a Sustainability Appraisal on all Development Plan Documents and prepare a report of the findings of the appraisal.

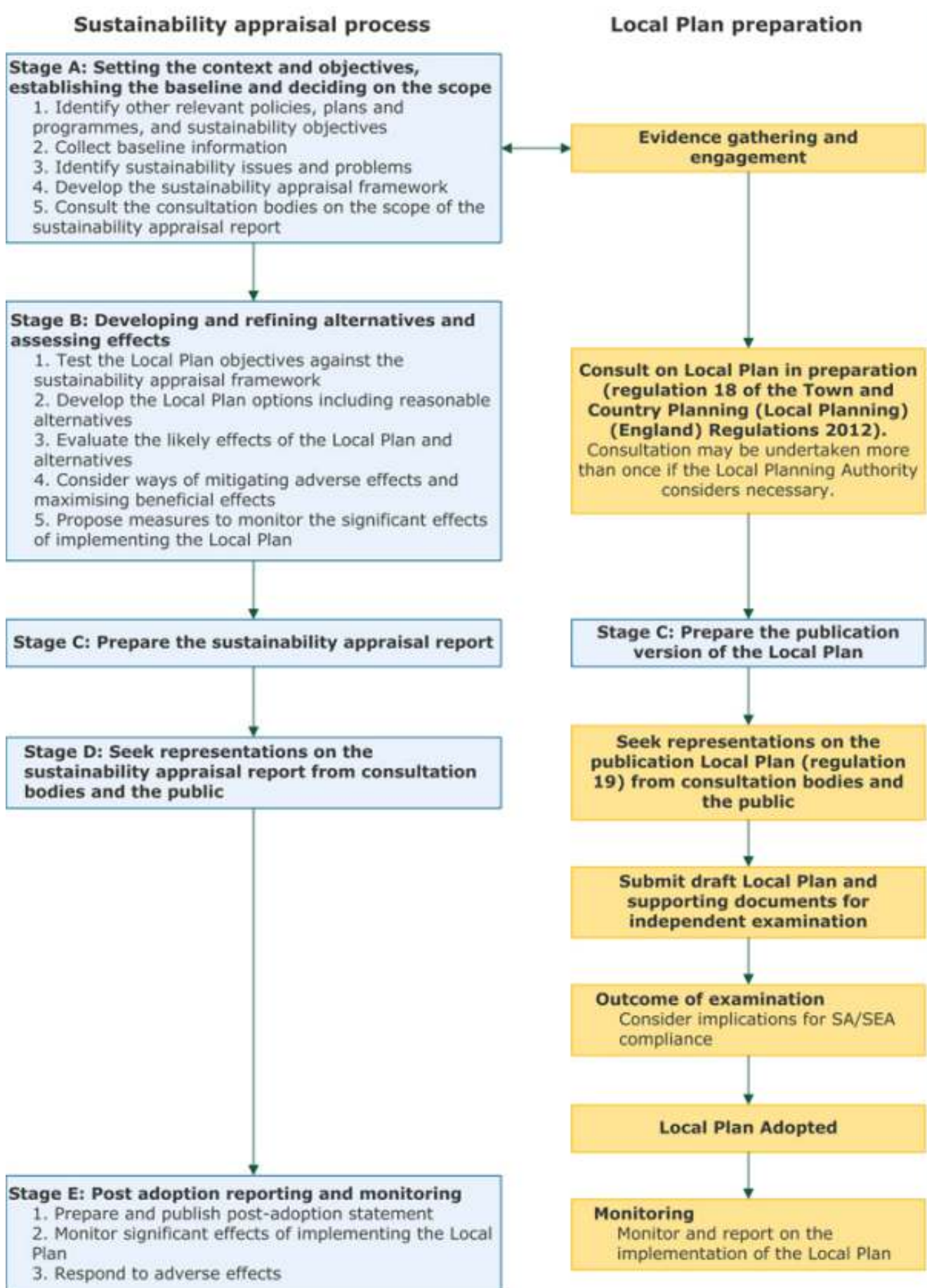
12. Sustainability Appraisals (SA) has been designed to incorporate the requirements of the European Directive 2001/42/EC. Whilst Strategic Environmental Assessment (SEA) solely focuses on environmental issues, SA considers the social, environmental, and economic effects of a plan.
13. This SA has been prepared for the BHP, one of Dudley Council's Development Plan Documents. The Issues and Options stage provides an opportunity to outline all the relevant issues facing the area and provides an opportunity to come up with various planning and spatial options to address those issues. The purpose of the sustainability appraisal of the BHP options is to assess the sustainability of each of the options and to find out any social, economic, or environmental impact that may occur.
14. Once the appraisal is complete and adopted, it will inform the policy and decision makers to provide solutions in order to mitigate any harmful impacts of development as necessary. This Sustainability Appraisal report outlines the SA methodology and framework used to carry out the SA of the BHP options. It also outlines the conclusion of the appraisal process through detailed analysis options.

Chapter 3: Methodology

1. This section sets out the methodology used to assess the BHP Issues and Options Report (consultation document). There are 5 main stages to the SA of a plan. Each stage is taken alongside the preparation, development, and monitoring stages of the plan. The production of this report represents **Stage B** in the SA process (Figure 1).
2. Figure 1 demonstrates that the plan preparation and production are directly linked to the SA process. It also shows that SA is an iterative process and ensures that sustainability issues are considered in plan preparation, and is a useful tool to identify the key issues to inform the plan.
3. **Stage A** involved establishing the framework for undertaking the SA: devising a set of sustainable development objectives against which the plan can be assessed, along with the evidence base to help inform the appraisal.
4. The first stage of the SA was the preparation of a Draft Scoping Report which set out baseline information as well as the draft objectives and indicators that would be used in carrying out the appraisal. Consultation was undertaken in accordance with the following Government regulations and the Council's own statement of Community Involvement (SCI):
 - Article 5 (4) of the European Union Directive 2001/42/EC;
 - The Environmental Assessment of Plans and Programmes Regulations 2004;
 - And Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004.
5. Relevant stakeholders were consulted on the Scoping Report. The consultation was carried out to:
 - Identify any gaps in the baseline information; and
 - To determine the appropriateness of sustainability objectives and key sustainability issues.
6. The Scoping Report has been sent to the three environmental statutory bodies: Environment Agency (EA), Historic England (HE) and Natural England (NE). The comments made by the stakeholders have been taken into account, and the revised Scoping Report will be published on the Council's website.
7. **Stage B** is the preparation of a SA for the issues and options report. This report has been produced alongside the Issues and Options document for the BHP. The aim is to ensure that the plan objectives are in accordance with the sustainable principles. The key task of this report is to test the plan objectives

against the SA framework and appraise the emerging options. Once a draft plan has been developed it will be assessed in more detail.

Figure 1: SA process and its relation to the plan preparation process



8. Consultation on this report will be undertaken alongside the options document for the BHP. The consultation period for this stage of the process will be from Monday 10th January 2022 to Monday 28th February 2022.
9. The scoring system used to assess the objectives is shown in Table 2 below.
10. The SA was carried out internally by the officers within the Planning Policy Team of Dudley MBC.

Table 2: Scoring system for SA Process

Likely to <u>significantly contribute</u> to the achievement of the sustainability objectives	++
Likely to <u>contribute</u> to the achievement of the sustainability objectives	+
Likely to have a <u>neutral effect</u> on the achievement of sustainability objectives	-
Likely to <u>conflict</u> with the achievement of sustainability objectives	X
Likely to <u>significantly conflict</u> with the achievement of sustainability objectives	XX
<u>Unpredictable</u> what the effect of policy/proposal might be, but <u>more likely to be positive</u>	+?
<u>Unpredictable</u> with the effect of policy/proposal might be, but <u>more likely to be negative</u>	X?

Chapter 4 – Testing the Plan Objectives

1. The Issues and Options report includes a draft set of objectives for the BHP. The draft objectives and options for the BHP were developed by analysing the baseline information identifying the main issues faced by the Borough and Brierley Hill. The draft objectives and options conform to national strategic policies set out in the NPPF and those set out in the Adopted Black Country Core Strategy and emerging Black Country Plan. It is also important for the objectives of the Plan to be in conformity with the principles of sustainability, while also being in compliance with the other BHP objectives. Testing the BHP objectives against the SA objectives is one way of checking for this compliance.
2. It is integral the BHP objectives conform to sustainability development principles and therefore need to be tested against the SA objectives to identify any potential conflicts. Potential conflicts identified may result in the need to alter the context of an objective to make it more orientated towards the achievement of sustainability development. The results of the testing of the draft BHP objectives against the SA objectives is set out in Table 3. The results from the compatibility matrix highlight some potential conflicts between the BHP objectives and the SA objectives. The main conflicts arise between objectives relating to development and those related to protecting and enhancing the environment. There will always be conflicts between the need for development and that of the interests of the environment and therefore the BHP objectives may need some further refining following consultation in order to obtain the minimal level of conflict between the two sets of objectives, whilst also recognising that development can contribute towards creating an improved environment.
3. The Issues and Options report for the BHP proposes the following vision for the BHP:

Brierley Hill and the surrounding area in 2039 will be a place which has the benefit of:

- A strong, resilient and thriving community with enhanced health and well-being, including having access to more cultural, leisure and community facilities.
- Being more than a shopping destination, including benefiting from a revitalised night-time economy and family leisure facilities.
- Having a greater resident population, living in sustainable, well-being enhancing accommodation incorporating energy efficiency measures and making active use of extensive areas of imaginatively landscaped and well-connected public spaces.
- Being a much greener place, with increased tree cover and more biodiversity including wildlife corridors, which is better linked to the Saltwells and Fens Pool Nature Reserves.

- Being much more accessible, especially by public transport and a network of footpaths and cycleways with the Midland Metro Stations providing focal points within these networks, and hubs for appropriate development and well-designed public open spaces around them.
 - Having a high quality built and natural environment that respects and enhances local character, including important historic buildings, and makes effective use of the canal network as an asset
 - Being a place of excellence in enterprise, education, and training.
4. To achieve the vision for the BHP the following 5 objectives have been set, these have been assessed against the SA objectives:
1. To set out and update the detailed planning policies and strategy for future development within the BHP area, including articulating the strategic steer provided by the Black Country Plan (BCP) through the identification of appropriate and deliverable site allocations within the BHP area and the formulation of policies that enable appropriate development to be delivered in a form and quality that is both sustainable and strongly in the interests of the local community and local environment.
 2. To provide an appropriate, imaginative, sustainable, resilient and deliverable planning framework for Brierley Hill Strategic Centre, which enables the centre to be much more than a shopping destination, with an emphasis on providing for the delivery of :-
 - a. New development centred around the proposed new transport infrastructure, particularly the Midland Metro Route, with the potential for new development to cluster around the proposed stops
 - b. The introduction of new high quality, well-being enhancing housing, potentially at a high density
 - c. The creation of more, well-linked community and leisure, and recreation spaces
 - d. The consolidation of the office use particularly at the Waterfront, but also allowing for a diversification of uses at this location
 - e. The diversification of land uses within the centre, particularly aimed at increasing their vitality
 3. In terms of place shaping, more full use of the opportunities presented by: -
 - a. The green and blue infrastructure, particularly the Dudley and Pensnett canals, Marsh Park and the nearby Saltwells and Fens Pool Nature

Reserves, with the potential to reinstate redundant canal arms to also function as recreational routes and/or wildlife corridors.

- b. To forge an effective pedestrian link between the Merry Hill Centre and Brierley Hill High Street
 - c. The proposed Midland Metro Stations
 - d. The potential for improvements to the High Street particularly informed by, and responding to its designations as a Conservation Area
4. In terms of design challenges, in particular addressing those posed by:
- - a. Pedestrian and cycle linkages, and wildlife corridors
 - b. Merging the mall at the Merry Hill Centre better into the surrounding urban fabric
 - c. The large areas of car parking at the Merry Hill Centre
 - d. Repurposing existing buildings and sites to deliver new high quality well-being enhancing homes and introducing new high density housing as appropriate
 - e. The introduction of sustainable measures, including renewable energy and sustainable drainage
 - f. Significantly increasing the number of trees, tree canopy cover and biodiversity and nature recovery networks within the plan area
 - g. Requiring measures which help prevent and/or mitigate for Climate Change
5. To have meaningful and sustained engagement with the community, in particular, in the potential for increased community provision within the centre
5. Table 3 below shows the compatibility matrix between the BHP objectives and sustainability objectives

Table 3: BHP Objectives and Sustainability Objectives compatibility matrix

SA objective	BHP Objectives				
	1	2	3	4	5
1	+	++	-	-	+
2	+	+	+	+	-
3	+	++	++	+	-
4	++	++	+	+	-
5	+	++	+	+	++
6	+	++	++	+	++
7	+	++	+	-	-
8	-	-	+	+	-
9	+	+	+	++	-
10	+	++	+	++	-
11	-	-	++	++	+
12	-	+	+	+	-
13	+	++	++	+	-
14	-	X?	-	+	-

Assessment of BHP objective 1 against SA objectives

BHP objective 1 scores positively against the SA objectives, as the identification of site allocations and policies to enable appropriate development would help to create local facilities and residential units in accessible locations, therefore encouraging the use of sustainable travel due to the reduced need for car-borne travel. Additionally, policies to deliver sustainable development will have environmental benefits and help to reduce pollution levels and the impact of climate change, while also enabling development in the interest of the community will have social benefits of creating a viable and vibrant community, which will also have economic benefits.

Assessment of BHP objective 2 against SA objectives

BHP objective 2 scores significantly positively against the SA objectives. The diversification of the centre would help to create a vibrant and viable centre, with both economic and social benefits as this would help create a community in an accessible location, through the objective of high-quality housing and facilities. The objective of having development centred around proposed transport infrastructure would help to increase the number of journeys completed through sustainable travel. The range of uses proposed and the consolidation of the existing office use will help develop a diverse economy.

Provision of new facilities and residential units in the area will lead to the production of more waste in the area. However, if managed in a sustainable way and recycling is encouraged, the impact from waste can be reduced.

Assessment of BHP objective 3 against SA objectives

BHP objective 3 scores positively against the SA objectives. The plan supporting the place shaping opportunities of the area, will have positive social and environmental effects for the area. Opportunities from green and blue infrastructure would have both environmental benefits of supporting the nature recovery of those areas, which is further supported by the social benefits presented by these options, in particular the health benefits. While Green and blue infrastructure also provides opportunities for in climate change adaptation. Additionally, the options for enhanced and additional pedestrian links will help connect these green areas to the wider area and will have positive impact by encouraging the use of walking and cycling within the area. In addition, there are opportunities for sustainable travel through new public transport initiatives, particularly the delivery of the Midland Metro (MM) network within the area.

The opportunities these options provide will also help to enhance the historic environment of the area, as well as, the sense of place in the area, which will encourage the development of a vibrant community with a sense of ownership, and interaction with the wider area.

The option of focusing development around public transport nodes has the potential to help address climate change, the use of sustainable energy, and the reduction of pollution, on the back of policies in both national and local policies to encourage the use of sustainable measures as part of new developments – these options therefore have the potential to have positive impacts on these elements.

Assessment of BHP objective 4 against SA objective

BHP objective 4 scores positively against the SA objectives. Addressing design challenges around pedestrian and cycle linkages and wildlife corridors will help to reduce traffic and pollution, through encouraging walking and cycling, which will also have benefits for health and helping to mitigate against climate change. Addressing design issues around climate change mitigation measures and the introduction of sustainable measures, will have significant environmental benefits for the area. While these design measure may not be the most economically viable solutions for developments, the social and environmental benefits of these measures will be significant. Addressing design issues around repurposing existing buildings, will have social benefits of bringing brownfield sites back into use, and the reuse of heritage assets through sensitively designed and responsive developments will help to protect and have the potential to enhance the heritage of the area. The reuse of existing buildings could also potentially have environmental benefits through the provision of sustainable energy measures as part of the design of development schemes.

Assessment of BHP objective 5 against SA objective

BHP objective 5 has not scored slightly positively against the SA objectives, with objective 5 scoring neutral against most of the SA objectives. Having meaningful and sustained engagement would have a positive social benefit to help create a vibrant community and help to ensure community provision is located within accessible locations within the centre, and would help to encourage social interaction through the investment of the community in the area through engagement.

Chapter 5 – Appraising the BHP Options

Introduction

1. The need to consider and appraise options stems partly from SEA Directive requirements. Under the SEA Directive Plan and Programme, proponents should ensure that “reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme are identified, described and evaluated” (Article 5 (1)) and The Environmental Report should include “an outline of the reasons for selectin the alternatives dealt with” (Annex I /(h)).
2. It should be noted that the role of the SA is a decision-making tool to determine which of the given options should be taken forward. The appraisal involves assessing each of the options against the SA Framework. When an option is carried forward, the appraisal will contain clear justification for doing so
3. The appraisal report is a qualitative piece of work and makes professional judgements, considering the information contained in the Scoping Report BHP (*link to scoping report on website?*).
4. This section sets out the key findings from the appraisals of the BHP options. The complete matrix is given below. This summary matrix provides an overview of the general performance of the different options against the SA objectives.
5. A summary is provided for each of the options with clear explanation and reasoning. The next section provides more detail on each of the options, in assessing whether a positive or negative impact has been appraised, whilst those which generated a neutral impact have not.

Table 4: Summary Matrix

BHP AAP Issues and options	SA Objectives														Comments	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Boundary Options																
<p>Issue: AAP Boundary</p> <p><i>Which of the two boundaries options do you prefer for the Brierley Hill Plan Area</i></p> <p>Option 2a – The Existing Boundary</p>																<p>The extended boundary would enable Green and Blue Infrastructure to have better connectivity, thereby providing the opportunity for more people to walk and enjoy green spaces, consequently having a positive effect on people’s health and wellbeing. Additionally, the proposed inclusion of Saltwells Wood, an area of natural, archaeological and geological assets, will provide the opportunity for further green linkages to the wood, along with an uplift in biodiversity.</p>
Option 2b – The Existing Boundary with Extensions	++	-	++	+	+	+	+	+	++	+?	+?	++	+?	+	X?	<p>The extended boundary also would include an additional conservation area, thereby adding to the historic assets contained within the plan area, intensifying the need for new development to be sensitive and responsive to the existing historic character of the area.</p> <p>Proposed public transport improvements in the area, including the Midland Metro will help reduce car borne journeys, thereby helping to tackle congestion, and reducing the number of car-borne journeys. This is likely to improve the local air quality as the amount of greenhouse gases emitted will be reduced. The inclusion of the additional areas will improve the accessibility between Brierley Hill High Street, Merry Hill and the new extended areas, further reducing the</p>

															<p>number of journeys by car and helping to create more interaction within the community. Also, improvements to walking and cycling facilities will improve the natural surveillance in the area which will help reduce crime and the fear of crime.</p> <p>The boundary extension includes areas for housing growth, thereby providing opportunities for housing choice with improved environmental benefits and connectivity to and within the BHP area.</p> <p>There is an opportunity to improve the profile and the vitality and viability of the High Street, through Future High street Funding and other plan policies, however, it will depend on the uptake from the businesses in the area. There are also areas within the plan boundary that will offer opportunities for a range of uses, including retail and leisure.</p> <p>Regeneration and the development which comes with it may result in an increase of energy usage, however, this has to be balanced against the proposed Green Infrastructure improvements, the promotion of sustainable modes of transport, and improvements to the public realm, which will help to minimise air, water, and soil pollution in the area. Reduction and minimisation of pollution will also have health benefits. Additionally, new development within the plan area will be encouraged to include energy saving measures, to incorporate water saving principles, Sustainable Urban Drainage Systems and grey water recycling.</p>
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There is an opportunity with the current and extended boundary to redevelop some underused sites and thereby accord with the SA objective aiming to make the best use of previously developed land.

As there is the opportunity for regeneration taking place in the area, it will lead to the increase in the production of waste, especially from the proposed new residential units. Also, as the policies and proposals of the plan are likely to result in more people living and working in the area, it is anticipated that the waste arising will increase. However, if waste is managed in a sustainable and environmentally friendly way, this effect can be minimised.

Summary: From the SA appraisal of the two options, boundary Option 2b is favourable in terms of the SA objectives. This option will help to deliver more positive social, economic, and environmental benefits.

Inclusion of the sites proposed in Option 2B will lead to better connection between the centre and the natural and historic areas for communities to enjoy, and will lead to more people visiting the centre, thereby having a positive contribution towards the area's economy. The connection will also lead to social benefits in term of reduced crime through improved natural surveillance.

<p>Issue: Town Centre Boundary</p> <p><i>Which of the options do you prefer for the Town Centre boundary, within which retail and leisure uses should be focused?</i></p> <p>Option 3a – The Existing AAP Boundary</p>	X?	-	X?	-	-	+?	+?	-	-	X?	-	-	+	-	<p>Having a more compact town centre would result in a more concentrated location of town centre uses, therefore facilities will be more easily accessible. This will also help reduce congestion, the need for vehicle travel, and with the improved public transport provisions and active travel within the area this will help improve local air quality and reduce the amount of toxic gases being emitted into the atmosphere.</p> <p>A more focused area for town centre uses, will enable the vitality and viability of the centre to be more easily safeguarded and uplifted. Additionally, projects such as the Future High Streets Fund and Heritage Action Zone will work towards delivering a better sense of place within the centre, however, this will depend on business uptake.</p>
<p>Option 3b – A more compact boundary incorporating Brierley Hill High Street, Merry Hill Centre and the land in-between, and the Waterfront</p>	+	-	++	-	+	++	+	-	-	++	-	-	++	-	<p>Regeneration schemes within the town centre boundary may result in an increase in energy usage, however, new developments will be encouraged to include energy saving measures, to incorporate water saving principles, Sustainable Urban Drainage Systems and grey water recycling.</p> <p>Summary: From the SA appraisal of the two options that boundary Option 3b is favourable in terms of the SA objectives. This option will help to deliver more positive social, economic, and environmental benefits.</p> <p>Having a more compact town centre boundary in Option 3b will lead to a more viable town centre, due to town centre uses being concentrated into smaller area, also</p>

															resulting in a reduced need for vehicle travel. This is likely to lead to more people visiting the town centre, thereby having a positive contribution towards the area's economy. The connection will also lead to social benefits in term of reduced crime through improved natural surveillance
Issue: Primary Shopping Area <i>Which of the options for the Primary Shopping Area at Merry Hill Centre, within which retail uses should be focus?</i> Option 5a – The exiting Primary Shopping Area at Merry Hill															Both options have score positively. The alternative shopping area (Option 5b) which includes additional retail units, would protect these units for acceptable uses, thereby provide more appropriate in-centre facilities in an accessible location, and along with the public transport improvements in the area, would provide them in a sustainable location, helping to reduce car-borne travel and consequently a reduction in air pollution. This option would also exclude the existing cinema site, allowing for potential redevelopment for either a town centre use or new residential accommodation in a sustainable location.
	+	-	+	-	+	+	+	-	-	-	-	-	+	-	
Option 5b – Alternative Shopping Area at Merry Hill	++	-	+	+	+	++	+	-	-	-	-	-	++	-	

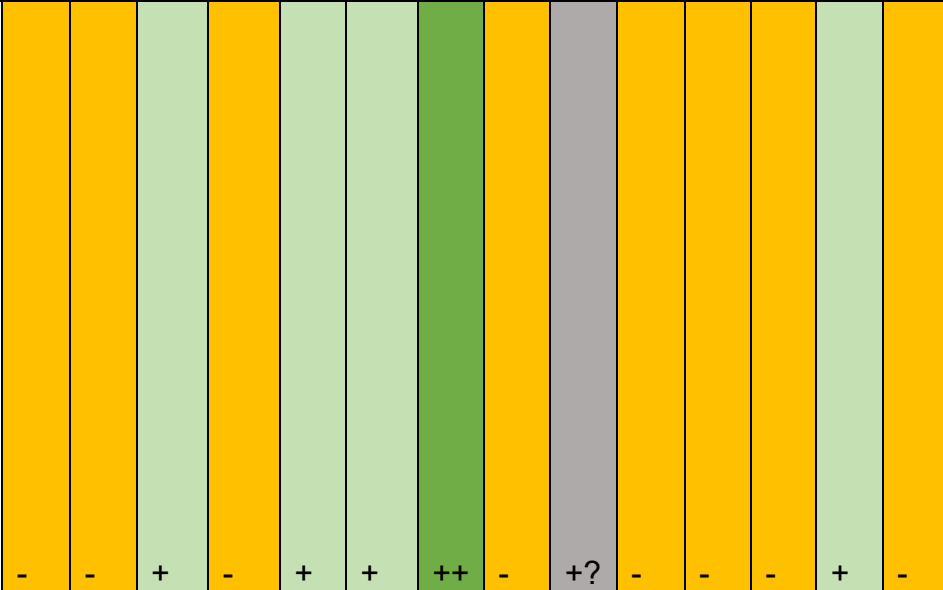
<p>Issue: Housing <i>Do you consider that new housing development would be prioritised within these broad locations?</i></p> <p><i>(these locations being: Harts Hill, Archill, Land at The Embankment; Land East of Venture Way; Waterfront West/Waterfront Way, Canal Walk South, and Land at Moor Street and Bell St</i></p>	+	-	+?	++	++	++	-	+?	+?	+?	-	+?	++	X?	<p>While more residential units within the centre will help to develop a strong community in the area, and reduce the need for car-borne travel to local amenities, it is also likely to result in an increase of energy usage.</p> <p>However, Green Infrastructure improvements, the promotion of sustainable modes of transport and improvements to the public realm will help to minimise air, water, and soil pollution in the area. Reduction and minimisation of pollution will also have health benefits. Also new residential development within the centre will be encouraged to include energy saving measures, to incorporate water saving principles, Sustainable Urban Drainage Systems and grey water recycling.</p> <p>Residential developments have the potential to leave to more waste production, however, if waste is managed in and sustainable and environmentally friendly way, this effect can be minimised</p>
<p>Issue: Housing <i>Do you think that a supported living scheme would be preferable within Brierley Hill?</i> Option 7a – Yes</p>	++	-	-	++	++	+	-	-	-	-	-	-	+	-	<p>Option A scores positively as a supported living scheme within Brierley Hill would be located in a sustainable location, due to the accessibility to local facilities, and help to create a vibrant community, by providing housing choice for a variety of age groups.</p>
<p>Option 7b - No</p>	x	-	-	XX	x	-	-	-	-	-	-	-	-	-	

<p>Issue: Housing</p> <p><i>Do you consider that the Chapel Street Housing Estate should be identified within the plan for regeneration as a housing site?</i></p>	+	+?	+?	++	+	+	-	-	+?	+?	-	+?	++	X?	<p>The Regeneration of the Castle Street Housing Estate scores positively against the SA objectives. The regeneration would make use of previously developed land, while also offering good quality housing to replace lower quality housing which is currently on the site. This would also help to develop a strong community in an area which is accessible to the local amenities, therefore helping to reduce car-bourne transport.</p> <p>The regeneration of the area would offer an opportunity to create a sense of place both within the Estate and as part of the wider area.</p> <p>The regeneration of the existing housing site would also offer the opportunity to include energy saving measures, incorporate waver saving principles and electric charging points which are not available in the current housing stock on the site.</p> <p>Residential developments have the potential to leave to more waste production, however, if waste is managed in and sustainable and environmentally friendly way, this effect can be minimised</p>
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Issue: industry and offices

Do you consider that these broad locations should be retained mainly industrial and office uses?

(these locations being Waterfront West, Waterfront East and Canal Walk North)



These retention of these locations for industrial and office uses would help to develop a diverse and knowledge-based economy and offer employment opportunities within the community helping develop a strong and vibrant Brierley Hill Community.

The broad locations of these uses are situated within sustainable locations, which would be further enhanced with the provision of the Midland Metro in the area.

While many of the units within these areas are existing industrial and office uses, there is potential to introduce sustainable energy through retrofitting, however this would depend on the uptake by the businesses

Issue: Leisure and Community Spaces within Brierley Hill

Do you consider that these areas should be identified in the plan mainly for community, leisure, entertainment and food and drink uses?

(these locations being: Brierley Hill Civic Core; Merry Hill; The Waterfront East Entertainment Zone; The Venture Way Health and Education Zone)

++	-	+	-	++	++	-	+?	+?	+?	-	-	+	X?
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These areas are located within sustainable locations which would be accessible by both active travel methods and public transport, and therefore can help to reduce air pollution generated through car travel.

The provision of community, leisure and entertainment uses within this area will help to enhance the vitality and viability of the plan area, and help to develop a vibrant community, using previously development land.

Due to the historic nature of the built environment within Brierley Hill Centre there is potential to bring historic buildings back into use and enhance the historic environment of the area, further helping to create a sense of place in the centre.

There is potential to introduce sustainable energy and water efficient measures through retrofitting however this would depend on the uptake by the businesses.

An increase in uses and people in the area will result in an increase in waste, however if waste is managed in a sustainable and environmentally friendly way, this effect can be minimised.

<p>Issue: Transport improvements</p> <p><i>Do you consider that we should give particular focus within the plan to the proposed Midland Metro stop at Cottage Street, to provide a high-quality landscaped area there, which is well linked in with the High Street?</i></p> <p>Option 11a – Yes</p>	-	+	++	-	-	++	-	+	-	+	-	-	+	-	<p>Option 11a) scores positively as this option would help to enhance the sense of place around the Midland Metro (MM) stations and enhancement of these areas can also help enhance the further surrounding areas, including heritage assets in the area. Additionally, it would also encourage the use of the MM and therefore reducing the demand for car-borne travel.</p>
<p>Option 11b – No</p>	-	x	XX	-	-	XX	-	-	-	x	-	-	x	-	
<p>Issue: Renewable Energy</p> <p><i>Do you consider that sites for Renewable Energy installations, such as solar panels and/or alternative renewable energy sources, should be identifies within the plan area?</i></p>	+	++	-	+	+	-	-	-	++	++	-	-	-	-	<p>Option 13a scores positively due to the environmental benefits of renewable energy. This option would also have social benefits, due to the benefits to health and wellbeing of introducing renewable energy, due to reducing levels of pollution.</p>

Option 12a – Yes																
Option 12b – No	-	xx	-	x	-	-	-	-	xx	xx	-	-	-	-		
Issue: The Greening of Brierley Hill <i>Do you consider that these measures and projects should be included within the plan to help Brierley Hill become a greener place?</i> (The specified locations being: new entrance gates at Saltwells NNR and associated greening measures along Pedmore Rd); the greening of Brierley Hill High Street; a green corridor to Fens Pool SAC; Option 13a – Yes															<p>The option to include measures and projects to Green Brierley Hill scores positively against the SA objectives, due to the environmental and climate change mitigation benefits of Green Infrastructure. Green Infrastructure also have social benefits due to the health benefits of green infrastructure, both with physical health due to reduced pollution and the urban cooling effects trees offer, but also mental health benefits of green infrastructure.</p> <p>The option of further greening measures along Pedmore Rd scores positively as this option would help to create a sense of place within the area, accessibility and people’s connection to the area, therefore encourage an increase in use of Saltwells NNR, and the feeling of community ownership. This would also have health benefits, both physical health through the leisure and recreation opportunities of the area and the mental health benefits or green infrastructure.</p> <p>The option of delivering further greening measures along Brierley Hill High Street scores positively:</p> <ul style="list-style-type: none"> • the reduction in parking would encourage the use of sustainable transport; • additional tree planting would help to enhance the sense of place • thus increasing both environmental and health benefit for the community 	
Option 13a – Yes	+	++	-	-	++	-	-	-	-	++	+	+	+	+		
Option 13b – No	-	xx	-	-	x	-	-	-	-	xx	xx	x	-	-		

															<p>The option of providing a green link to Fens Pool SAC scores positively as this option would help to create a sense of place within the area, increase accessibility and people's connection to the area, and therefore encourage the use of Fens Pool and the feeling of community ownership.</p> <p>This would also have health benefits, both physical health through increased leisure and recreation opportunities of the area and the mental health benefits or green infrastructure</p>
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Chapter 6 – Monitoring the significant Effects

1. SA reports must include measures to prevent, reduce or offset any significant adverse effects of implement the BHP. These measures are referred to as mitigation methods, but they also include proactive avoidance of adverse effects as well as actions taken after the effects are noticed. The details of this will be carried out at the Draft Plan Stage.
2. It is apparent that the options set out within the Issues and Options Report will have both positive and negative effects. Where negative effects have been predicted, means of mitigation will be applied to lessen such effects. In some instances, adverse environmental effects will be unavoidable, as they will need to be offset against economic gain. However, it needs to be borne in mind that plans and policies also provide an opportunity to enhance environmental conditions, especially in areas which have been abandoned and remain derelict.
3. National guidance reiterates the need to consider the monitoring implications of plans and programmes, which should take place throughout the plan making process, rather than being a consideration at submission stage. As a result, the sustainability effects of implementing the BHP will be monitored to identify unforeseen effects and to enable remedial action to be taken. Monitoring will help to assess the impact of the BHP on the baseline information discussed, for example, impacts on job creation, zero carbon development and affordable housing delivery. Such issues relate to the specific sustainability objectives devised, which the plan seeks to satisfy. Appraising the options (by means of positive, negative and neutral indicators) enables significant effects to be predicted, however, monitoring is imperative to assess how actual development contributes towards social, economic and environmental objectives.
4. In terms of monitoring the methodology, a framework has not yet been developed, as this will be addressed in greater depth at a later stage of the plan making process, and become part of the LPA's wider monitoring work addressed in the Annual Monitoring Report. In doing so, key sustainability indicators from the SA framework will be used in order to meet the requirements of SA monitoring.

Chapter 7 – Summary and Conclusions

Summary and Conclusions

1. The Sustainability Appraisal (SA) process is a subjective and iterative process, involving informed judgements rather than hard science, particularly at this (Issues and Options) stage of the plan. Consequently, a more rigorous and robust framework for assessment will be applied at later stages of the plan to determine the most appropriate options in environmental economic and social terms.
2. The next stage in the development is the BHP Draft Plan stage. This will take on board the feedback from the Issues and Options consultation and lead to the SA Report being updated accordingly
3. An SA for the Draft Plan document will then be published alongside the related stage of the BHP.