3 Assessment of Housing 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[25], 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 As set out in the SLP Spatial Strategy Paper, and according to the government's standard method calculation, there is a need for approximately 29,773 homes in Sandwell by 2041. There is an existing supply of 11,194 homes, based on the most recent evidence with regard to suitable residential land (this includes identified sites, small windfalls and surplus vacant floorspace in centres), resulting in an unmet need for 18,579 homes.

3.1.4 Sandwell faces challenges in meeting the identified housing needs owing to the finite supply of land suitable for housing. Given the scale of this unmet need, the Council will explore the potential of exporting some of Sandwell's housing need to neighbouring authorities through the Duty to Co-operate (DtC) to deliver more housing.

3.1.5 Six options for the quanta of housing growth have been identified by SMBC (see **Table 3.1**). These options include numbers based on different sources to provide an illustration of how the SLP could address the borough's housing need in a realistic manner.

Table 3.11: *Sandwell Housing Growth Options identified by SMBC*

Option	Description of Housing Growth Option	Dwellings per annum	Outcome (no. of dwellings)
A	Meet a proportion of housing need across plan period (2022-2041) based on average annual levels of delivery for last 10 years (do nothing)	659	12,523
B	Meet entire housing need identified through Standard Method across plan period (2022-2041): based on 2014 household projections (using 2022 affordability ratio)	1,567	29,773
C	Meet entire housing need identified through Standard Method across plan period (2022-2041): based on 2021 census figures (based on increase in households of 7.2%[26])	1,238	23,522
D	Meet proportion of local housing need based on supply and small windfalls identified in current SHLAA (2022) and seek contributions from adjacent authorities based on current offers and apportioned using travel to work data (DtC)	476	9,044

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

[26] 2021 Census showed number of households in Sandwell increased by 7.2% since 2011

Option	Description of Housing Growth Option	Dwellings per annum	Outcome (no. of dwellings)
E	Meet proportion of local housing need based on supply and small windfalls identified in current SHLAA (2022) plus aspirational growth in the Regeneration Areas and Centres and seek contributions from adjacent authorities based on current offers and apportioned using travel to work data (DtC)	588	11,167
F	Meet housing need (Standard Method 2014 and 2022 affordability ratio) and contribute 2,000 houses to wider HMA needs	1,590	30,206

3.1.6 **Table 3.2** summarises the likely impacts of each housing growth option in relation to the 14 SA Objectives. The text within **section 3.2** sets out the accompanying assessment narrative which explains how each overall impact was identified.

3.1.7 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by SMBC, as well as expert judgement. The options do not specify information regarding location, density or design, meaning that there is some uncertainty in all the assessments.

Table 3.22: *Impact matrix of the six housing growth options*

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Housing Growth Option	Cultural heritage	Landscape	Biodiversity, flora, fauna and	Climate change mitigation	Climate change adaptation	Natural resources	Pollution	Waste	Transport and accessibility	Housing	Equality	Health	Economy	Education, skills and training
A	+/-	-	-	-	+/-	-	-	-	+	+	-	+	+	+
B	+/-	--	--	--	+/-	--	--	--	-	++	+/-	-	+	-
C	+/-	--	--	--	+/-	--	--	--	-	+	-	-	+	-
D	+/-	0	-	-	+/-	-	-	-	+	+	-	+	+	+
E	+/-	0	-	-	+/-	-	-	-	+	+	-	+	+	+
F	+/-	--	--	--	+/-	--	--	--	-	++	+/-	-	+	-

3.2 Assessment

SA Objective 1 – Cultural Heritage

3.2.1 Within Sandwell there are two Grade I, eight Grade II* and 195 Grade II Listed Buildings, seven Scheduled Monuments (SM), nine Conservation Areas (CA) and five Registered Parks and Gardens (RPG). There are also a range of historic character areas and areas of historic townscape / landscape value identified within the borough[27].

3.2.2 Development in close proximity to cultural heritage features has the potential to adversely affect their significance or setting. Adverse effects may occur owing to the risk of encroachment into the remaining undeveloped areas of the borough leading to alteration of historic character, particularly in suburban settlements. Conversely, there would also be potential for new development, particularly within Sandwell's centres, to encourage regeneration and potentially improve the historic character and setting of heritage assets in some locations.

3.2.3 As the site location, context and proximity to receptors is unknown at this time, the potential impacts of the housing growth options on cultural heritage features are uncertain.

3.2.4 Generally speaking, Option F has potential to lead to the largest impact on cultural heritage as it proposes the highest number of dwellings, followed by Option B and C. Conversely, Option D proposes the fewest number of dwellings so may have the greatest scope to avoid sensitive locations, whereas Option E proposes a similar housing number to Option D and includes a focus on "*aspirational growth in the Regeneration Areas and Centres*", meaning that Option E could be the best performing with the greatest potential to achieve positive effects on the historic environment, although potential for localised adverse effects remains.

SA Objective 2 – Landscape

3.2.5 Although the borough is highly urbanised, it also contains gently undulating hills and other pockets of undeveloped land. Green Belt land is located to the north-east of the borough and is bisected by the M5 motorway. The landscape of the borough's Green Belt is largely described as low or low-moderate sensitivity to development although open landscapes within the borough are important for maintaining separation between settlements[28]. One area in Sandwell Valley is described as having moderate-high sensitivity. Within the urban areas, Sandwell's history and industrial legacy provides distinctiveness and a sense of local identity. Urban green spaces also provide benefits to the local character.

[27] Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf [Date accessed: 17/10/23]

[28] 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: 17/10/23]

3.2.6 Whilst the context and specific locations of the proposed dwellings within each of the six options are not known, without careful planning, all options could lead to an adverse impact on the landscape owing to the risk of encroachment into the remaining undeveloped areas of the borough leading to alteration of character, tranquillity and sense of place in suburban settlements.

3.2.7 Generally speaking, Option F has potential to lead to the largest impact on the landscape / townscape as it proposes the highest number of dwellings (30,206), closely followed by Option B (29,773) and C (23,522), all of which could lead to a major negative impact assuming that large proportions of growth would be directed to previously undeveloped land. Option B in particular does not refer to DtC contributions and so may put the greatest pressure on Sandwell's landscapes and townscapes, assuming all 29,773 dwellings would be accommodated within the SLP area. Option A would deliver a lower number (12,523), with potential for a minor negative impact on the landscape / townscape.

3.2.8 Option D proposes the fewest dwellings (9,044) so may have the smallest impact and greatest scope to avoid sensitive locations, whilst additionally seeking contributions from neighbouring authorities, that could expect to result in less pressure on the SLP area. However, Option E proposes a similar housing number (11,167) to Option D and includes a focus on "*aspirational growth in the Regeneration Areas and Centres*" and would also seek contributions from neighbouring authorities. On balance, both Options D and E could lead to an overall negligible effect on the landscape, although it is likely that Option E would have the greatest potential to achieve benefits in some locations, making it the best performing option.

SA Objective 3 – Biodiversity, Flora, Fauna and Geodiversity

3.2.9 There are nine Local Nature Reserves (LNRs) within Sandwell, forming key sections of the ecological network within the SLP area in addition to the numerous Sites of Importance for Nature Conservation (SINCs) and Sites of Local Importance for Nature Conservation (SLINCs). There are no Sites of Special Scientific Interest (SSSIs) or National Nature Reserves (NNRs) within the borough, but both are present in neighbouring authorities close to the Sandwell Borough boundary. Areas of geological interest include Rowley Hills, Bumble Hole & Warrens Park LNR and Sandwell Valley Country Park. Over 50% of Sandwell's Green Belt land is described as having very high ecological value[29]. Some priority habitats and small areas on ancient woodland are also present in the borough.

3.2.10 There is potential for all proposed options to have an adverse impact on biodiversity and geodiversity at the landscape scale due to the increased development related pressures and threats such as habitat fragmentation and recreational pressures on wildlife sites, despite any biodiversity net gain (BNG) provisions at the site level, owing to the large quanta of housing proposed.

[29] EcoRecord (2019) An Ecological evaluation of the Black Country Green Belt. Available at: https://blackcountryplan.dudley.gov.uk/media/13896/an-ecological-evaluation-of-the-black-country-green-belt-final-report-2019-redacted.pdf [Date accessed: 20/10/23]

3.2.11 Options C, B and F are expected to have the largest impact as they propose the highest housing growth (23,522, 29,773 and 30,206 dwellings respectively) and as such a major negative impact is identified, because it is more likely that significant areas of previously undeveloped land would be required to facilitate this level of growth. Whereas, under Options D, E and A fewer houses are proposed (9,044, 11,167 and 12,523 dwellings respectively) so a minor negative impact is recorded.

3.2.12 Option D may have the smallest impact on biodiversity overall, depending on site-specific characteristics and sensitivities, although Option E could be seen as the best performing overall when considering that the focus on Regeneration Areas and Centres may lead to the largest potential to offset short-term adverse effects with longer-term benefits. It should however be noted that there is some uncertainty in this assessment, given that Options D and E would also seek contributions from neighbouring authorities and so the benefits of BNG may be delivered outside of the SLP area.

SA Objective 4 – Climate Change Mitigation

3.2.13 The two largest sources of CO_2 emissions in Sandwell are residential buildings and road transport, however, according to Sandwell Trends, in 2021 almost 30% of households within the borough did not own a car[30]. Investments in public transport, walking and cycling provisions could help to reduce pollution and provide better access across the borough without using privately owned transportation.

3.2.14 All housing options propose a large quantum of new dwellings which would have the potential to increase CO_2 and other GHG emissions to some extent through construction and occupation phases. Option D proposes the fewest number of new dwellings (9,044) and as such may have the least impact on emissions, followed by Option E (11,167) and Option A (12,523), although a minor negative impact would be likely for all three. Since Options C, B and F propose significantly higher numbers of new dwellings (23,522, 29,773 and 30,206 respectively), these three options would have potentially major negative impacts on climate change mitigation.

3.2.15 The potential of new development under any growth option to draw on renewable or low-carbon energy supplies is not known at this stage of assessment.

SA Objective 5 – Climate Change adaptation

3.2.16 Given its mostly urban setting, Sandwell is likely to suffer from the 'urban heat island' effect which may be made worse by new development in the borough. Green infrastructure (GI) and open spaces can help urban areas adapt to climate change, by providing protection from extreme weather events and helping to reduce the 'urban heat island' effect; these functions could be compromised by greater urban density and loss of GI. Density and location information is not known for the housing options, making potential impacts of this nature difficult to determine.

[30] Sandwell Metropolitan Borough Council (2023) Sandwell Trends: Housing and Car Ownership. Available at: https://www.sandwelltrends.info/household-characteristics/ [Date accessed: 11/08/23]

3.2.17 Sandwell is affected by flooding along the River Tame the River Stour and by surface water flooding with all six wards having been affected by previous flooding events. The introduction of new dwellings and impermeable surfaces can exacerbate surface water flooding, but implementation of adaptive technologies can help to mitigate this. Option D has the smallest number of proposed dwellings and, depending on the location of the developments, may have less of an impact on potential flooding than Option F which has the largest number of proposed dwellings.

3.2.18 Overall, as the location and site context of the proposed new dwellings is not known at this time the potential impacts of the housing growth options on climate change adaptation are uncertain. Potential adverse effects on climate change adaptation should be carefully considered and mitigated for in any potential developments.

SA Objective 6 – Natural Resources

3.2.19 The majority of land within Sandwell is classified as ALC 'urban', although there are small pockets of 'non-agricultural' land and a small amount of Grade 3 and 4 land in the north east of the borough. Development within the urban area would not result in the loss of best and most versatile (BMV) agricultural land and may provide opportunities for re-use of previously developed land, helping to promote an efficient use of natural resources. There are no mineral safeguarding areas (MSA) present in Sandwell.

3.2.20 As the location of the proposed new homes are not currently known the exact impact the different options will have on natural resources within the borough cannot be fully determined, but it is likely that the proposed developments would lead to encroachment into the remaining undeveloped areas of the borough to some extent which may have environmental value, even if not BMV agricultural land. As such, all options could lead to adverse effects on natural resources.

3.2.21 Options B, C and F would deliver the most housing growth, and as such would be expected to put the greatest reliance on previously undeveloped locations for new development, leading to a potential major negative impact. Whereas, Options A, D and E propose a lower quantum of growth, with a potential minor negative impact. Option E states that growth will be sought within "*Regeneration Areas and Centres*", meaning that this option could potentially provide the most efficient use of previously developed land and be the best performing option in terms of natural resources, although some small-scale loss of soils would still be likely.

SA Objective 7 – Pollution

3.2.22 Sandwell has a borough-wide AQMA, and for several years nitrogen dioxide concentrations have exceeded legal limits in seven monitoring stations[31]. Where people live in more urban settings their potential exposure to air pollution is greater than in rural areas where there would likely be less traffic. As such increasing the number of new dwellings would likely have a negative impact on air quality as increased populations would also likely increase the number of cars on the road and would likely expose new residents to poor air quality. As Option D has the fewest number of proposed dwellings it may have the smallest impact in comparison to Option F with the most dwellings which would likely have the largest impact.

3.2.23 Soil and water pollution impacts will depend on the nature, scale and location of developments which are unknown. Overall, all housing options would be expected to increase pollution to some extent both through construction and occupation so a negative impact would be expected against this SA Objective. Options A, D and E have been identified as having a minor negative impact on pollution overall, whereas Options B, C and F are more likely to have a major negative impact owing to the larger scale of proposed growth. Simplistically speaking, since Option D proposes the lowest housing number this option could be the best performing in terms of pollution.

SA Objective 8 – Waste

3.2.24 It is likely that all options for housing growth would increase household waste production. In 2018 the per person rate for waste in Sandwell was 593kg, higher than the national average, 394kg per person[32]. Although national trends suggest that the volume of household waste produced is decreasing, the Black Country Waste Study[33] indicates that additional capacity for certain types of waste management will be required, taking into account the large amount of projected growth in the area.

[31] Sandwell Metropolitan Borough Council (2020) Climate change strategy 2020-2041. Available at: https://www.sandwell.gov.uk/climate-change-1/climate-change/3#:~:text=In%20recognition%20of%20the%20urgency,carbon%2Dneutral%20borough%20by%202041 [Date accessed: 18/10/23]

[32] Sandwell Metropolitan Borough Council (2020) Climate change strategy 2020-2041. Available at: https://www.sandwell.gov.uk/climate-change-1/climate-change/3#:~:text=In%20recognition%20of%20the%20urgency,carbon%2Dneutral%20borough%20by%202041 [Date accessed: 18/10/23]

[33] 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 [Date accessed: 02/06/23]

3.2.25 It can be expected that the higher the proposed housing number, the higher the number of new residents, as such it would be likely that Options F, B and C, with the highest numbers of proposed new dwellings at 30,206, 29,773 and 23,522 dwellings respectively, would increase the waste production the most with a potential major negative impact identified. Options A and E would be likely to have a slightly lesser impact, with 12,523 and 11,167 homes respectively, and Option D would be the best performing option as it has the fewest proposed new dwellings at 9,044 dwellings, although a minor negative impact would still be likely overall.

SA Objective 9 – Transport and Accessibility

3.2.26 Sandwell is well served by a dense network of public transport providing links regionally and nationally. Accessible public transport links are key to sustainable development and are an important consideration when deciding the location of potential new dwellings. It is likely that new dwellings in existing urban areas would allow residents to utilise existing public transport links including buses, rail and metro, rather than relying on private cars, however it is probable there would be some increase in traffic flows and it is possible that this increase in vehicles would lead to an increase in congestion.

3.2.27 It is expected that Options B, C and F would create a higher burden on the existing public transport infrastructure and road network compared to Options A, D and E, because they would deliver a large quantum of growth within Sandwell and do not seek to export growth to neighbouring authorities. Although, there may be more opportunities within Options B, C and F to drive investment in or provide new public transport links with benefits to the local area. On balance, Options A, D and E could potentially lead to a minor positive impact on transport and accessibility because under these options it is likely that the majority of new residents would be situated close to existing centres, and that the smaller quantum of growth proposed could be accommodated within Sandwell without significant implications for the transport network. A minor negative impact is identified across Options B, C and F as these options propose significantly higher growth with more likelihood of dispersed growth and increased pressure on transport networks.

SA Objective 10 – Housing

3.2.28 Within Sandwell there is an identified need for 29,773 homes by 2041; Option B meets this requirement and consequently would be likely to have a major positive impact on housing provision. Option F proposes a total of 30,206 homes which would exceed the identified need for Sandwell, resulting in a contribution towards wider HMA needs, also leading to a major positive impact on housing provision. Options A, C, D and E would not deliver enough homes to meet the identified need, and as such, a minor positive impact on housing provision is identified for these four options.

3.2.29 At this scale of assessment, it is uncertain what the likely contribution of each housing growth option to meeting the different needs of the population on housing mix, provision of extra care housing, accessible housing and affordable homes would be, but it is likely that those which provide a higher quantum of growth would have greater scope to provide a range of types and tenures.

3.2.30 However, it should be noted that it is unclear to what extent Options A, B, C and F are achievable without significant increases in density, use of undeveloped land and/or significant export of growth, given that there is an existing supply of only 11,194 homes in Sandwell.

SA Objective 11 – Equality

3.2.31 Deprivation is high across the SLP area, with 36 Lower Super Output Areas (LSOAs) in Sandwell ranked among the 10% most deprived in England[34]. Residential growth in urban areas could potentially help facilitate social inclusion by providing new residents with good access to key services and employment opportunities, however, increasing housing density in deprived areas could also lead to exacerbation of existing inequalities. 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 the six housing growth options on equality.

3.2.32 However, as Options A, C, D and E would not deliver enough homes to meet the identified need, these four options could also put pressure on housing and rental costs, which could lead to issues with poorer quality accommodation and overcrowding, with adverse implications for health and wellbeing of the population. Overall, a minor negative impact could occur for Options A, C, D and E, whereas there is greater uncertainty in terms of equality for Options B and F.

SA Objective 12 – Health

3.2.33 Residents in Sandwell have relatively good access to health facilities with 73 healthcare centres[35] and Sandwell General Hospital located in the borough. The majority of the urban area has good pedestrian and public transport access to healthcare, although introducing new residential growth would likely place pressure on the capacity of these services. Parks and green spaces are important for human health; 24% of Sandwell is made up of such green space and some of which have been awarded the Green Flag[36]. The green space provision per person is expected to decrease as development occurs within the borough, in addition to increased pressure for existing open spaces to be used for development.

[34] Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019 [Date accessed: 11/08/23]

[35] According to Black Country Accessibility Modelling (2021) data

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

3.2.34 Since the location and density of growth under the proposed options is unknown, it is difficult to determine the likely effects in terms of accessibility to, and pressure on, healthcare and green spaces. Overall, it is expected that the significant housing growth under Options B, C and F would have potential to cause significant over-capacity issues and would be reliant on new infrastructure to support this level of growth, as well as potentially requiring development on existing open spaces. Whereas, the lower amount of housing growth under Options A, D and E would be more likely to be accommodated within the existing urban area in proximity to infrastructure and would place less pressure on infrastructure. On balance, a minor negative impact could occur as a result of Options B, C and F, and a minor positive impact for Options A, D and E. In this regard, Option D could be seen as the best performing option since it proposes the lowest quantum of growth.

SA Objective 13 – Economy

3.2.35 The options considered in this assessment focus on housing growth only. It is assumed that future housing development would not result in the loss of existing employment floorspace.

3.2.36 The highest density of employment locations can be found in the centre and north of the borough and along key transport routes. Housing growth within these areas, and the urban area in general, would be expected to provide residents with good sustainable access to employment opportunities and transport links. The locations of the proposed new homes under the housing options are not known, however, transport modelling data[37] indicates that almost the entire borough lies within a 30-minute travel time via walking or public transport from employment locations. With new homes there may also be a benefit to the local economy in terms of increasing footfall and spending in the retail/commercial centres. All options could potentially lead to a minor positive impact for this objective.

SA Objective 14 – Education, Skills and Training

3.2.37 Within Sandwell there are 98 primary schools and 20 secondary schools[38]. It is assumed that new residents in the SLP area will require access to primary and secondary education to help facilitate good levels of education, skills and qualifications of residents. The location of proposed new homes under the options is not known so their impact on existing education facilities is uncertain, however, a smaller number of proposed homes may put less pressure on existing provisions, as such making Option D potentially the best option in this regard.

[37] Unpublished data provided to Lepus by the Council, produced as part of the evidence base for the former BCP

[38] According to Black Country Accessibility Modelling (2021) data

3.2.38 The larger scale of development proposed in Options B, C and F may require significant extra provision to be included alongside the residential growth to take account for the increased population, particularly Option B as this would deliver 29,773 homes without exporting any of this growth to neighbouring authorities. On balance, Options A, D and E could lead to a minor positive impact assuming that under these options a large proportion of new development would be located within sustainable distance to schools and the lower proportion of growth could be accommodated with less pressure on infrastructure, whereas a minor negative impact is identified overall for Options B, C and F.

3.3 Conclusion

3.3.1 It is generally expected that the options proposing larger numbers of houses would be more likely to lead to adverse effects when analysed against environmental objectives, but that they would perform better against economic objectives. The converse is also expected in that options with fewer houses would perform better against the environmental objectives compared to the economic objectives, as such it is difficult to identify an overall best performing option.

3.3.2 For the impact of each option to be fully understood details of the size, location and nature of the developments are required; as these options focus on quanta alone, the assessments are necessarily high level with restricted diagnostic conclusions.

3.3.3 Options D and E have been identified most often as the best performing. Overall, it appears that generally Option D would have the smallest impact across the most SA Objectives, for example SA Objectives 4 (Climate Change Mitigation), 5 (Climate Change Adaptation), 7 (Pollution) and 8 (Waste). Option E would deliver a slightly larger housing number than Option D, and also seeks to focus new development within the Regeneration Areas and Centres, which is likely to lead to a more efficient use of land and more benefits in terms of rejuvenating Sandwell's centres and ensuring a greater proportion of new residents are located within a sustainable distance of services and facilities. Option E was identified as the best performing against SA Objectives 1 (Cultural Heritage), 2 (Landscape), 3 (Biodiversity) and 6 (Natural Resources).

3.3.4 Options D and E, alongside Option A, perform similarly against SA Objectives 9 (Transport and Accessibility), 12 (Health) and 14 (Education, Skills and Training) since these three options deliver the smallest quantum of growth, c.9,500 – 12,500. All options perform similarly against SA Objective 13 (Economy).

3.3.5 Option F is identified as the best performing against SA Objective 10 (Housing) given this option would exceed the identified housing need and benefit the wider HMA. Options F and B would both meet Sandwell's housing need and as such would be most likely to deliver benefits in terms of addressing inequalities (SA Objective 11). However, both perform poorly against the more environmentally focused objectives, alongside Option C, when compared to Options A, D and E since Options B, C and F would all deliver c.23,500 - 30,000 homes.

3.3.6 Options A, B, C and F may however not be achievable without significant increases in density, use of undeveloped land and/or significant export of growth, given that there is an existing supply of only 11,194 homes in Sandwell.

3.3.7 On balance, Option E is identified as the best performing option, assuming that a large proportion of growth under this option would be on previously developed land and within the existing centres, with the benefits in terms of regeneration meaning this option slightly out-performs Option D, although both would not deliver sufficient housing to satisfy the identified need.

3.4 Selection and Rejection

3.4.1 Reflecting on the SA findings (as set out in **section 3.3**) and SMBC's objectives for the emerging SLP, the Council consider that:

3.4.2 "*The options providing higher levels of housing are unlikely to be deliverable in Sandwell, given the various constraints and adverse ground conditions that affect much of the land within the borough. Given the importance of balancing housing growth with environmental and climate change aspirations, while at the same time achieving the delivery of housing that will help meet the needs of Sandwell's residents, an option allowing for the delivery of a realistic and sustainable quantum of housing, that includes elements of aspirational housing and will also help deliver the plan's wider aims and ambitions around regeneration, growth and supporting the economy.*

3.4.3 *On this basis, we feel that* ***Option E*** *will provide the most sustainable and deliverable minimum target for new housing across the plan period*".