

Sandwell Local Plan – Regulation 18 Draft Plan Consultation Form

Draft Plan Regulation 18 Consultation (November 2023)

We are inviting your views on the Draft Sandwell Local Plan and this form should be used to make comments in response to this consultation.

The consultation period begins on **Monday 6th November 2023** and ends at **5pm** on **Monday 18th December 2023**

Comments can also be submitted online using our website at <https://sandwell.oc2.uk/>. We would encourage you to respond to our Sandwell Local Plan – Regulation 18 Draft Plan consultation using our online form as it saves time and reduces cost.

However, if you prefer, you can use this version of the response form and email it to Sandwell_LocalPlan@sandwell.gov.uk or post it to Sandwell Local Plan, Planning Policy, Sandwell Council House, Freeth Street, Oldbury, B69 3DE

PLEASE NOTE:

This form has two parts:

- Section 1: Personal details
- Section 2: Your representation/comments on the Draft Plan or Sustainability Appraisal
- Section 3: A declaration which you will need to read and sign

1. Please complete a separate response for each part of the Draft Plan / Sustainability Appraisal that you wish to comment on. If you wish to make comments on more than two parts, please copy and paste the text in Section 2 or complete more than one paper form.
2. Responses must include your name and address.
3. **Your comments cannot be treated as confidential.** By completing this form, you agree to your details being shared and your name and comment (but not your address or other personal details) being made available for public viewing.
4. It is recommended that groups that share a common view send a single response rather than multiple copies of the same response. Please attach a list of the contact details of each person who supports the comments, including their names and addresses.
5. Further paper copies can be provided by emailing Sandwell_LocalPlan@sandwell.gov.uk
6. Completed forms should be received by us no later than **5pm on 18th December 2023**

For official use only:

Respondent No:		Representation Number:	
Date Received:			

Section 1- Your Details

	1. Personal details	2. Agent's details (if applicable)
Title	Mr	
First name	Stuart	
Last Name	Morgans	
Job Title (where relevant)	Principal Planning Manager	
Organisation (where relevant)	Sport England	
House No./Street	Sportpark, 3 Oakwood Drive	
Town	Loughborough	
Post Code	LE11 3QF	
Telephone Number		
Email address		

Notes:

1. If you are an agent responding on behalf of an organisation please ensure that your details are in the Agent's details column and give the details of the client you are responding for in the Personal Details column, only the title, name and organisation boxes are necessary.
2. If you are responding as an individual (e.g. a resident) you do not need to fill in the job title and organisation boxes unless you are responding as a member of an organisation.

Please indicate which of this best describes you / your role in responding to this consultation			
Resident or Individual		Local Authority	
Planning Agent or Consultant		Public service provider e.g. education establishment, health etc	
Developer or Investor		Public agency /organisation	X
Landowner		Community or Organisation	
Business		Charity	
Land & Property Agent or Surveyor		Other (please specify in space below)	

Please note that copies of all comments received, including the name(s) of the respondent(s) will be made available for the public to view. All other personal details will remain confidential. Sandwell Council will process your personal data in accordance with the Data Protection Act 2018. Our Privacy Notice is at the end of this form.

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Section 2: Your Representation / Comments

Please complete a separate copy of this section for each part of the document(s) you wish to comment on (i.e. Draft Plan or Sustainability Appraisal)

Title of document you are commenting on

Sandwell Local Plan - Appendix B Housing Allocations

To which part of the document do your comments relate? Please state the policy number, Sandwell Local Plan reference number, paragraph number, page number or figure number

SH3,

What is the nature of your comments? (Mark as appropriate)

General comment

☐

Support

☐

Objection

☒

Please provide your comment below:

Expand this box as necessary. If attaching additional sheets, please clearly mark these with the title of document and part of the document that the comment relates to, and your name.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SH3 (SA21) 88-90 Dudley Road West - The proposed allocation for housing would lead to the loss of an existing indoor cricket facility for which para 99 of the NPPF and draft policy SHW5 would apply. No reference is made to mitigating the loss of this existing sports facility or demonstrating it is surplus in accordance with these relevant policies. Sport England therefore objects to the proposed allocation, and would recommend that either the allocation be deleted from the plan, or be revised so as to ensure the sports facility is retained, or that additional text be added to make it clear that the proposed allocation can only come forward subject to addressing the loss of the facility in line with the above policies.

SH9 (SA28) The Phoenix Collegiate, Friar Park Road, Wednesbury - Notwithstanding that the site has an existing outline planning consent for residential development, this is subject to a section 106 agreement to secure mitigation for the loss of existing playing fields. The planning consent whilst still extant has not been implemented. It is important to recognise that the site contains existing playing fields, the loss of which would need to be mitigated in line with para 99 of the NPPF, draft policy SHW5 and Sport England's Playing Field Policy and Guidance. As drafted the allocation does not address this and so Sport England raises an objection to the proposed allocation. To address this, the allocation wording should reference the need to mitigate the loss of playing field.

SH18 (SA55) Friar Park (STW/SMBC land), Wednesbury - Sport England recognises that the allocation does make reference to mitigating the loss of playing pitches in line with the PPOSS/Action Plan, but objects to this being subject to viability testing, since there is no relevant exception criteria for viability testing in para 99 of the NPPF, nor within draft policy SHW5, nor within Sport England's Playing Fields Policy and Guidance. To address, this we recommend that the reference to viability testing be removed.

SH34 (SA79) Brandhall Golf Course - The allocation references an existing planning application for redevelopment of the site, for which Sport England have objected. We recognise that there is no longer a need to retain the 18 hole municipal course, but take the view that mitigation should be secured to make qualitative improvements to the existing golf course facility at Warley Woods in line with the findings and recommendations of the PPOSS 2022. We understand that a planning condition has been included to secure this mitigation. To address this, we would recommend that an appropriate reference be added to the allocation regarding securing an appropriate the off-site contribution towards golf.

SH40 (SA94) Langley Swimming Centre, Vicarage Road, Oldbury - This existing Leisure Centre site contains two swimming pools and a health and fitness centre. The facility closed in July 2023 when the Sandwell Aquatics Centre opened for public use. The SAC provides equitable or better facilities in both quantity and quality, and is in a suitable location, in line with para 99 of the NPPF, and so Sport England has no objection to the loss of this site to sport.

SH43 (SA166) Land off Tanhouse Avenue, Great Barr - The site includes an area of disused playing field that has previously been delineated to provide a football pitch. The proposed allocation does not reference this, and does not identify the need to mitigate the loss of the playing field in line with para 99 of the NPPF, draft policy SHW5 and Sport England's Playing Fields Policy, and so we object to this proposed allocation. To address this, either the proposed allocation should be deleted, or additional text be added to make it clear that the proposed allocation can only come forward subject to addressing the loss of former playing field in line with the above policies.

SM2 (SA199) Lion Farm, Oldbury - The site constitutes existing playing field for which para 99 of the NPPF, draft policy SHW5 and Sport England's Playing Fields Policy apply. Sport England notes the allocation is for retention of 6 sports pitches with changing facilities and car parking (5 ha), with the remainder to be lost to a mix of residential, employment and open space uses. We note the reference that this allocation is strongly caveated by the ability to relocate 6 pitches to the southern part of the Borough, however this does not provide sufficient comfort that a proposal will come forward to provide replacement playing field that is equivalent or better quantity, equivalent or better quality, in a suitable location, and subject to equivalent or better accessibility and management arrangements to meet the relevant Exception criteria of our policy. The Council's own evidence base in the PPOSS 2022 identifies shortfalls of capacity for football in Oldbury and across the Borough, both now and in the future, with a recommendation to protect and enhance the quality of the existing pitches at Lion Farm. The site is well used for adult league football in the Warley Sunday League by several local teams whose demand would likely be displaced should the site be redeveloped. Sport England are aware that finding a suitable site(s) to replace 6 pitches will be extremely challenging for the Council in light of the findings and recommendations of the PPOSS, and so in the absence of detailed deliverable proposals that demonstrate how these pitches would be replaced in line with the relevant policies referred to above, Sport England is of the view that there is significant doubt that the caveat would be reasonably met. We consider this allocation to be in direct conflict with the Council's stated ambitions, vision and objectives of the Draft Plan, particularly those that seek to improve the health and well-being of Borough's residents. As such, Sport England strongly objects to the proposed allocation which should be removed from the plan.

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Section 3: Declaration

How we will use your personal information

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 2018. The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004, and may be used by the council to contact you if necessary regarding your submission. Your name, organisation and comments will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and in order to protect personal data, we will not publish signatures, telephone numbers, addresses or email addresses on the internet. To understand more about why we collect your information, what we do with your information, how you can access your information, your personal information rights, how and to whom to raise a complaint about your information, please visit our privacy notice page at <http://www.sandwell.gov.uk/privacynotices>

Please sign and date this form. Forms signed electronically will be accepted.

Declaration:

By completing and signing this form, I agree to my name, organisation and representations being made available for public inspection on the internet.

Signature:



Date: **14/12/2023**

I understand that in submitting my representations, that my details will be added to the Sandwell Local Plan Consultation database and I may be contacted at future stages of the local plan process.

All personal data will be processed in accordance with the Data Protection Act 2018 and the General Data Protection Regulation ('GDPR'). If you do not wish to be contacted further, please advise us.

☐	No, I do not wish to be contacted about the Local Plan
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Thank you for taking time to complete and return this response form.

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