**Sandwell Local Plan – Regulation Publication Consultation Form**

# Regulation 19 Publication Consultation

We are inviting your views on the Regulation 19 Sandwell Local Plan and this form should be used to make comments in response to this consultation.

The consultation period beings on **Monday 23rd September 2024** and ends at **5pm** on **Monday**

**11th November 2024**

Comments can also be submitted online using our website at [**https://sandwell.oc2.uk/.**](https://sandwell.oc2.uk/)We would encourage you to respond to our Sandwell Local Plan – Regulation 19 Publication 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 Reg 19 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 11 November 2024**

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| **Section 1- Your Details** |
|  | **1.Personal details** | **2. Agent’s details (if applicable)** |
| **Title** | Mrs |  |
| **First name** | Melissa |  |
| **Last Name** | Ross |  |
| **Job Title (where relevant)** | Senior Policy & Strategy Officer (Planning) |  |
| **Organisation (where relevant)** | Lichfield District Council |  |
| **House No./Street** | Frog Lane |  |
| **Town** | Lichfield |  |
| **Post Code** | WS13 6YU |  |
| **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 | X |
| Planning Agent or Consultant |  | Public service provider e.g. education establishment, health etc |  |
| Developer or Investor |  | Public agency /organisation |  |
| 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.

**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. Local Plan or Sustainability Appraisal)

Local Plan

**Title of document you are commenting on**

**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*

3.13

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Paragraph** |  | **Policy** | Policy SDS1 | **Policies****Map** |

## Do you consider the Local Plan is:

* 1. Legally compliant Yes No

* 1. Sound Yes No

* 1. Appear at the Examination Yes No


## Please provide your comment below:

5. Please give details in the box below of why you consider the Regulation 19 Publication Sandwell Local Plan is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19 Publication Sandwell Local Plan please set this out below.

Thank you for the opportunity to respond to Sandwell Metropolitan Borough Council’s (SMBC) Local Plan Publication (Regulation 19) consultation. Lichfield District Council (LDC) welcomes this opportunity to provide formal comments on the plan.

The comments below focus on the primary area of concern from Lichfield District Council’s perspective which relates to unmet housing need arising from Sandwell and the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA).

LDC along with SMBC have been an active member of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) officers’ group and have contributed to discussion relating to the delivery of unmet need within the housing market area, including the ongoing work to update the 2018 Strategy Growth Study.

LDC notes that the consultation on the NPPF included proposals to change the ‘standard method’ which is used to calculate an areas Local Housing Need. Under the proposed changes SMBCs LHN would decrease by 3%, whilst LDC’s will increase significantly (by 160%). As such, it is important that as both authority’s plans progress, they have regard to the relevant housing requirement and consider the implications for both councils should the proposed changes to the standard method be implemented by Government having regard to any transitional arrangements.

It is noted that at paragraph 3.13, the SLP identifies that there is a total local housing need of 26,350 and that the SLP aims to allocate sites to deliver 10,434 of these homes. As such, the plan proposes a supply of just over 39% of its total need. This shortfall when combined with further potential shortfalls within the housing market area is significant. There is concerned that the ‘balanced green growth’ may not have thoroughly explored all opportunities to increase housing delivery within its administrative area, including reviewing Green Belt boundaries and increasing densities. As such, LDC considers that in the context of this unmet need SMBC should have undertaken a review of its Green Belt boundaries to order to understand whether changes to the boundary could be made to assist in meeting its own needs. SMBC will need to full evidence and justify that they have explored and exhausted all options to accommodate growth within their administrative area. Furthermore, SMBC should identify any further potential sources of housing land supply and ensure that all development opportunities within its administrative area are maximised prior to any shortfall being exported to other areas.

LDC notes that Policy SDS1 states that housing and employment needs that cannot be accommodated within the borough will be exported to neighbouring local authority areas. LDC wishes to stress that this should be based on a clear understanding of the functional and physical relationships within the functional economic area, including migration and commuting patterns, to ensure needs are met as close as possible to where they arise.

**Section 4: 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 publishsignatures, 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**](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: Melissa Ross………………………………………………

**Date: 04/11/2024……………………………………**

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

**Thank you for taking time to complete and return this response form.**