**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 4th 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 4 November 2024**

|  |
| --- |
| **Section 1- Your Details** |
|  | **1.Personal details** | **2. Agent’s details (if applicable)** |
| **Title** | Mr | Mr |
| **First name** | N | John |
| **Last Name** | Rawlings | Pearce |
| **Job Title (where relevant)** |  | Associate |
| **Organisation (where relevant)** | Bloor Homes Western | Harris Lamb |
| **House No./Street** |  | 4th Floor, 4 Brindley Place |
| **Town** |  | Birmingham |
| **Post Code** |  | B1 2LG |
| **Telephone Number** |  |  |
| **Email address** |  | j |

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 | x | 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)

Regulation 19 Publication Consultation 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*

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

## Do you consider the Local Plan is:

* 1. Legally compliant Yes  No 
	2. Sound 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.

The strategy as presented proposes to allocate 10,434 new homes in Sandwell leaving a shortfall of 15,916 dwellings that are needed but which cannot be accommodated in the Council’s administrative area. This is a substantial number of homes and represents a substantial number of people and families that will go without homes should a definitive solution not be found.

Bloor consider that in the absence of any formal agreement with the other authorities within the HMA to find a location to secure the delivery of these 15,916 dwellings the plan is unsound and object to the plan on this basis. As will be demonstrated below, the housing shortfall has reached critical levels across the HMA and the onus is on the authorities where the housing need cannot be met to secure the support of the authorities with land available, including thos with Green Belt land, to assist.

Meeting the needs of all part of the population

The pressure to find a definitive solution to address the housing shortfall, is only further emphasised by the fact that the delivery of affordable housing on those sites within the Sandwell administrative area will fall woefully short of the affordable housing need identified. The Black Country Housing Market Assessment Report (March 2021) identified a need for 4,605 social rented properties and 1,913 shared ownership dwellings (accounting for nearly 24% of the total housing requirement. The release of Green Belt sites in the HMA to meet the overspill from both Sandwell and Dudley will deliver not only market, but much need affordable homes for those parts of the population that most need it.

Supporting Economic Growth

Delivering the right number of homes, in the right location is an important component in fostering economic growth. For Sandwell, this means securing the delivery of homes as close to and /or in locations well connected to Sandwell as possible. The obvious locations being Bromsgrove to the south and South Staffordshire to the west, when you account for the adjoining authorities not having the capacity to assist with meeting Sandwell’s need. It is Bloor’s view that the starting point should be sites on the edge of the conurbation to provide homes close to where the demand arises which can provide a range of homes for the existing and future workforce; supporting indigenous economic growth and inward investment opportunities..

Shortfall in housing land across the HMA

The shortfall of land for housing is not unique to Sandwell and is a long-established concern within the HMA. Birmingham Development Plan

The Birmingham Development Plan (“BDP”) was adopted in January 2017 and was the first authority in the HMA to conclude it could not meet its housing need within its administrative area. Policy PG1 – Overall Levels of Growth, advised that 89,000 dwellings are required during the course of the plan period (2011 to 2031) to meet the growth requirements of the City. However, only 51,100 additional dwellings can be accommodated within the City’s administrative area. This leaves a shortfall of 37,900 homes including 14,400 affordable homes (that will need to be delivered elsewhere within the Greater Birmingham Housing Market Area). The BDP stipulated that Birmingham’s unmet need was to be met by other authorities in the HMA as and when they produced individual Local Plans. This has not happened.

Birmingham City Council has commenced a review of its Local Plan and consulted on Preferred Options concluding in August 2024. The Preferred Options Local Plan advised that the Standard Method housing requirement for the period 2020 to 2042 is 149,180 dwellings. The plan stated that a supply of 103,027 dwellings had been identified leaving a shortfall of 46,153 dwellings. The supply is made up of reuse of employment sites along with a number of SHLAA sites. The shortfall of 46,053 dwellings relies upon all SHLAA sites coming forward for development and the provision of a significant number of windfalls. Bloor have submitted representations to the Birmingham plan querying whether the identified supply is robust.

Black Country Core Strategy Review

Previously, the four Black Country authorities had been preparing a joint Plan although this has was subsequently abandoned in late 2022 in favour of the preparation of individual Plans for each authority. Notwithstanding the above, the Preferred Options Black Country Plan proposed a housing requirement based upon the Standard Method which was the sum of the four individual authority housing requirements. The housing requirement for the four authorities was 76,076 dwellings, however, there was only an identified capacity of 47,837 dwellings leaving a shortfall of 28,239 dwellings to be directed to other authorities. Now, each authority will calculate its own housing requirement using the standard method calculation. Dudley has recently published a Publication Draft of its Local Plan that confirms that its housing need is 11,169 dwellings but that it only has capacity to delivery 10,470 dwellings leaving a shortfall of 699 homes. Wolverhampton also carried out Preferred Options consultation earlier in the year and they had identified a shortfall of just under 12,000 homes. Walsall is yet to publish a plan although it is anticipated that there will be a further shortfall in what is required against their capacity to meet these needs.

Total shortfall

If the housing shortfall figures in the emerging Birmingham and Wolverhampton Preferred Option plans and the shortfalls in the Dudley and Sandwell Publication Plans are added together it totals 74,768 dwellings. As noted above, this has the potential to increase even further when the shortfall arising in Walsall is added.

Objection

Bloor object to Policy SDS1 on the basis that it is not positively prepared, not effective and not consistent with national policy. The policy and approach to meeting housing needs within Sandwell will result in significant housing need going unmet leaving those in need of housing having to incur increasing costs of housing be that through purchase or renting costs, increased overcrowding and a greater number of people living in housing that is not suitable for their needs. As well as the social cost of not providing enough housing the economic impacts of not meeting the needs of the population are potentially as significant, if not more so, if those of working age population cannot find somewhere to live in the Borough they will leave and work elsewhere. This outward migration could lead to an ageing population being left with a smaller working age population present which could impact on the delivery and provision of services. The impacts are significant and as such, the approach set out in the plan is unsound.

In order to address our concerns the Council need to establish and agree with other authorities in the HMA how and where its unmet needs are going to be met. This needs to be a tangible and workable solution as opposed to the mere suggestion of working together. Without a signed memorandum of understanding between the HMA authorities with each setting out what proportion of unmet need each is due to take there is no realistic prospect that Sandwell’s housing needs are going to be met in full.

I would like to attend the Examination.

**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.

Digitally signed by John Pearce

John Pearce

**Signature: ………………………………**D**…**ate**…**: 2**…**02**…**4.1**…**0.3**…**1 1**…**0:2**…**6:**…**55 **…**Z **…**

## Date: ………………………………………

06.11.2024

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.**