**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](mailto:Local@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](mailto:Local@sandwell.gov.uk)
6. Completed forms should be received by us no later than **5pm on 4 November 2024**

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| --- | --- | --- |
| **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** |  | [john.pearce@harrislamb.com](mailto:john.pearce@harrislamb.com) |

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.

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| --- | --- | --- | --- | --- |
| 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** | Duty to cooperate | **Policy** |  | **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.

Duty to Cooperate

Paragraph 24 of the Framework confirms that Local Planning Authorities are under a duty to cooperate with each other on strategic matters that cross administrative boundaries. Paragraph 26 goes on to state that joint working should help to determine where additional infrastructure is necessary and where development needs that cannot be met wholly within a particular area could be met elsewhere. The level of unmet need arising within the HMA is one such area where the Duty to Cooperate should be employed in order to determine where this unmet need should be directed.

Having regard to the Greater Birmingham Housing Market Area there are 14 authorities within it which include Birmingham, the four Black Country authorities and 9 other surrounding authorities. In light of the shortfall arising in Birmingham, Dudley, Wolverhampton and Sandwell this effectively leaves 10 remaining authorities where the need could be distributed.

Turning to each of the remaining authorities it is highlighted above that there is potentially a shortfall that will arise in Walsall when it comes to publish their Preferred Options Local Plan. Redditch Borough is effectively built up to its boundary and already has to look to its adjoining neighbour, Bromsgrove, in order to accommodate its housing need. It would be unable to accommodate any further unmet. Similarly, Tamworth had to look to its adjoining neighbours of Lichfield and North Warwickshire in order to meet its current housing requirement in its adopted Local Plan. It too would be unlikely to be able to accommodate any unmet need from the Sandwell. Cannock Chase’s capacity is restricted due to environmental constraints including the Cannock Chase’s SAC and AONB. A small part of Stratford-upon-Avon District falls within the Housing Market Area whilst North Warwickshire have previously committed to delivering 3,790 dwellings to meeting Birmingham’s needs up to 2031 in its adopted Local Plan (2021). Solihull’s Local Plan previously proposed to contribute approximately 2,000 dwellings to meet the needs of Birmingham although the Council has subsequently withdrawn the plan from Examination.

This effectively leaves Lichfield, South Staffordshire and Bromsgrove as the three remaining authorities that would be able to make any meaningful contribution to meeting housing needs arising in the wider HMA. However, a review of what these local authorities has been proposing to help meet the housing shortfall across the HMA falls woefully short of what is needed.

South Staffordshire have previously proposed to accommodate 4,000 dwellings to meet the needs arising in the Black Country although this was subsequently reduced to just under 700 homes when the council re consulted on a Pre-Submission draft Plan in April 2024. Lichfield were proposing around 2,000 homes before withdrawing their plan. Bromsgrove has yet to publish a draft plan and so it is yet to state how many dwellings it may be prepared to accommodate. Collectively this equates to just under 700 homes that are currently being made available to meet the unmet needs of the HMA (this may increase if Bromsgrove propose to meet some unmet need) which will fall woefully short of addressing the housing need of local people and families across the HMA.

The outcome of the above is that there is a significant unmet housing need arising principally from Birmingham, Wolverhampton and Sandwell, with Walsall also likely to add to this, and at the current time there is no agreement or clear strategy between the 14 HMA authorities as to where or how this unmet need is to be met. Furthermore, in the few authorities that have the ability to assist in meeting the overspill, full opportunity of the land available around the conurbation to assist with meeting the housing overspill is not being taken.

It is clear from the above that the emerging position across the HMA is one where there is a significant housing need that exists, but where certain authorities, such as Sandwell, cannot currently meet its needs in full. Bloor contend that these un-met needs must be met by the HMA authorities in the next round of plans that are now being prepared. If this need is not met in full, it risks giving rise to a number of significant knock on effects on the delivery and provision of housing across the greater Birmingham area. These impacts include:

* worsening affordability as demand outstrips supply,
* worsening delivery and provision of affordable housing,
* economic impacts on the working age population as those adults who are able to work may not have suitable accommodation to live in thus resulting in increased commuting distances, worsening impacts on congestion and air quality, and
* the inability to attract workers into the HMA could have significant repercussions for the wider economy if the right type of houses are not available for those wanting to live and work in the conurbation.

Objection

In light of the Council's need and the significant shortfall that the Council is faced with, Bloor do not consider that the Council has met its duty to cooperate. We urge the Council to enter into constructive and productive discussions with the other HMA authorities, including Bromsgrove, to seek agreement on how and where this unmet housing need is going to be delivered.

Meeting the housing needs of the HMA cannot be achieved on an authority by authority basis and that a joined up approach that crosses administrative boundaries will be required if there is to be any chance of meeting the HMA’s housing needs both in terms of quantum and the required mix, including affordable homes.

It is our view that the focus for addressing the shortfall in Sandwell should be those authorities closest to them. Bromsgrove and South Staffordshire are the closest authorities with a meaningful ability to address the shortfall and with land available adjacent to the conurbation. The Bromsgrove plan review is still at an early stage and there is still plenty of scope to hold meaningful discussions to provide land to meet the needs arising in Sandwell.

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**…**0:3**…**2:**…**10 **…**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.**