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/.** 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**

For official use only:			
Respondent No:		Representation Number:	
Date Received:			

Sandwell
Metropolitan Borough Council

Section 1- Your Details		
	1.Personal details	**2. Agent's details (if applicable)**
Title	Mr	
First name	Ian	
Last Name	Carroll	
Job Title (where relevant)	CHAIR	
Organisation (where relevant)	The Frineds of Sheepwash Local Nature Reserve	
House No./Street		
Town		
Post Code		
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	
Landowner			Community or Organisation	X
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.

For official use only:			
Respondent No:		Representation Number:	
Date Received:			

Sandwell
Metropolitan Borough Council

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)

Title of document you are commenting on	Local Plan Policy SNE2

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	1-12	**Policy**	SNE2	**Policies Map**	

2. Do you consider the Local Plan is:

2.1 Legally compliant	Yes	☐	No	☐
2.2 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.

For official use only:			
Respondent No:		Representation Number:	
Date Received:			

N.B As part of this submission and including objections of soundness for SH35 and SH36, please find enclosed a petition of those named supporting these comments which should be used as a barometer of public opposition to residential development in this location. Please also refer to attached FOS evidence PDF which cites relevant material in numbered parentheses.
WE make the following comments in regard to each numbered paragraph of this policy. Some points we consider sound and support, others need to be reworded to be sound and some deleted to be sound.
1 Unsound. Do not support SMBC calculation of 10% net gain due to their failure to independently assess private land in alllocation proposals like SH35 and SH36. Lepus consulting report for BNG is not a credible piece of evidence to base conclusions upon and is seriously flawed in its assessments and calculations of land only in council ownership. Previous faliure to secure 10% gain is noted.
https://www.expressandstar.com/news/local-hubs/sandwell/tipton/2023/02/21/wildlife-buffer-zone-to-be-removed-to-make-way-for-industrial-warehouse-in-tipton/

2 a-d In principle sound, but as above, the basis for Sandwell assessing private sites is lost on their failure to already survey them. Their consultant report failed to survey sites properly in terms of habitats, species and different times of year. Only 1 single visit was made to assess their chosen BNG sites which is not acceptable.No apparent correlation/collaboration with Eco record reports, other conservation groups and interested parties, give the impression that this was a rushed bolt on assessment to look credible and a tick box exercise. The report is not credible at all when scrutinised.

3 UNSOUND, REMOVE PARAGRAPH. This will be the actual standard as a result of this policy given the council cannot independently varify any report produced by the applicant. SH35 and SH36 for example are 100% rewillded for the purpose of "private open space". To achive devlopment of proposed 500 plus hoiuses would require ALL of this to be dug up, every tree and plant uprooted and vast swathes of biosdiversity land lost BEFORE any so called "gain" of 10%. In essence the policy is a fraud , not justifed and disingenuous and unsound.
4 In principle sound, but same issues as above.
5 Unsound. Do not possibly see a developer being around for 30 years and the council will not be monitoring any onsite activity as it has no baseline to start with that can be independetly varified.
6 TOTALLY UNSOUND. Not justified given the poor report it has based its chosen sites on, and the weaknesses of the sites in terms of their poor current scores. No reason stated by council in the Lepus report for exclusion of privately owned sites, or sites like existing LNR SINC sites like Sheepwash that do not even appear to have been considered but ARE owned by sandwell council! . Do not agree with the methodology used to choose these sites.
7 Support as sound, but the previous papargraphs in this policy, particularly privately owned land and lack of surveying compromises this strategy and directly threatens it. Only council owned sites appear to be valued.
8 sound
9 sound. We agree that sites like SH35 and SH36 should be retained as extensions to Sheepwash LNR and become a SINC. SH35 area has very rare small blue butterfly and associated kidney vetch so of important scientific interest and protection from development as a local green space. (31)
10 Unsound. Again what assessments will be made that could lead to developers claiming that all of their sites contain invasive species, and therefore cut down everything on site and then increase that by 10% starting from a baseline of nothing!
11 Sound
12 Sound

Real concern that this policy will fail and become an unworkable licence to destroy anything on a private sites, only to claim 10% back using the council land identified by council BNG on their own land. Council may benefit from this but nature does not. Council need to create more local nature reserves and extend others with land allocations SH35 and SH36 to realise connectivity of sites within Sandwell and beyond as a more appropriate strategy. Also relevant and not mentioned in the publication plan is SMBC FULL council meeting
Notice of Motion – 29 October 2024. Animal Welfare

“ Council notes that:

Protecting wildlife and natural habitats is crucial for maintaining biodiversity and ecological balance. ”
A choice of certain sites for housing allocations like SH35 and SH36 are not consistent with this motion passed by the full council on the date stated.

For official use only:			
Respondent No:		Representation Number:	
Date Received:			

Sandwell
Metropolitan Borough Council

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 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: 1/11/2024

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.

For official use only:			
Respondent No:		Representation Number:	
Date Received:			