



Sandwell
Metropolitan Borough Council

Sandwell Local Plan
Response to Issues and Options
Consultation Representations
November 2023

Summary of Main Issues Raised by Issues & Options Consultation and the Councils' Responses

NOTE: the representations have been summarised and Council responses relate to land use issues only.

Sandwell Local Plan Review			
Main heading or question number	Support*	Object*	Comment*
1.Sandwell Local Plan Review	0	0	10
1) Questions – Vision and Objectives	0	0	4
What do you think are the main issues that the new SLP should address in Sandwell?	0	0	11
Please indicate which option you think should be used as the basis for preparing the SLP Vision – Option A: The Sandwell Vision, or Option B: Create a new Vision	0	0	10
If you think the SLP should include a new Vision (along the lines of the suggested wording above), do you think the Vision should cover any other issues?	0	0	9
Once you have had a look at the issues raised in this document, please let us know your thoughts on the following overall matters: Topic Areas, Evidence Base	0	0	5
Should the Sandwell Local Plan: Promote higher levels of development to support economic growth; or plan for the minimum necessary to help meet the needs of our population?	0	0	9
Do you think the SLP should be valid until 2041 or should it run for longer?	0	0	7
What are your thoughts on the draft objectives?	0	0	8
2) Questions – Strategic Policies	0	0	3
Do you agree with the Council's decision to incorporate some of the former BCP policies into the SLP, to benefit from the work already done on them and to make it potentially easier for the four Black Country councils to address certain wider than local matters in a joined up manner?	0	0	15
TOTAL	0	0	91

Main Heading/ Question No.	Key Issues Raised by the Representations	Council's Response	Proposed Change
1.Sandwell Local Plan Review	Natural England advises that the Plan's vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, Rights of Way Improvement Plans, Green Infrastructure Strategies and Nature Recovery Networks	<p>The Sandwell Local Plan Vision 2041 places Sandwell at the forefront of tackling climate change. The vision is for Sandwell's residents to enjoy access to the natural environment and will see new landscaping schemes, additional tree cover and increase opportunities for nature.</p> <p>The Biodiversity Action Plan, Local Nature Partnership, Rights of Way Improvement Plans, Green Infrastructure Strategies and Nature Recovery Networks have all been used as evidence to support the policies and proposals within the Draft Plan.</p>	<p>Amended Vision.</p> <p>Various policies in the Draft Plan set out the Council's strategic approach to the protection and enhancement of the natural environment, including policies for nature conservation, wildlife habitats, trees woodlands and hedgerows and geodiversity.</p>
	Natural England would like to see the inclusion of strategic policies to protect and enhance valued landscapes, as well criteria-based policies to guide development.	Agreed	Chapter 4 - Sandwell's Natural and Historic Environment, contains a number of policies dedicated to the protection and enhancement valued landscapes. The policies are detailed and will provide guidance for development.
	Where it can be demonstrated that health facilities will be changed as part of wider NHS estate reorganisation programmes, it should be accepted that a facility is neither needed nor viable for its current use and Planning policies within the Local Plan must support the principle of alternative uses for NHS land and property. This will ensure that there is not a delay to vital reinvestment in facilities and services for the community.	<p>Noted</p> <p>Continuing dialogue between the Council and healthcare providers, including as part of the production of the Infrastructure Delivery Plan, will ensure that healthcare facilities are provided and protected. Any proposals for new development on</p>	Policy SHW2 - Healthcare Infrastructure, deals with the provision of new healthcare facilities and the protection of existing facilities. The policy aims to protect healthcare facilities unless it can be demonstrated that any loss is as a result of a public service transformation plan with regard to facilities.

	<p>NHS land and property should be able to grow and expand on existing NHS sites and on land across the borough unhindered. Policies should support the delivery of public service improvements as quickly as possible and allow for adaption to meet changing needs for health buildings.</p>	<p>healthcare sites that are surplus to requirements will be dealt with on their own merits in accordance with policies in the Sandwell Local Plan.</p>	
	<p>Welcome its vision and objectives as it reflects many of the aims we need for action, as set out in the LTP and wider WMCA goals including those common actions we need to address in partnership.</p> <p>As the new WM LTP now sets the tone for development of transport policy and strategy in the region, we request acknowledgement of the relationship the statutory Local Transport Plan has with Sandwell's emerging Local Plan.</p> <p>We see it being important for all future land use plans within the region to pay consideration to - helping provide enhanced accessibility whilst also addressing the negative impacts of mobility on people and places with the planned Black Country LTP Area Strategy possibly helping to capture some of these elements.</p>	<p>Noted</p> <p>It is an ambition of the Draft Local Plan to deliver a co-ordinated and strategic travel and transport network through Sandwell that links communities.</p>	<p>The Transport chapter of the Draft Local Plan recognises the WMCA and Transport for West Midlands as the local transport authority. The policies within the Draft Plan take into account the LTP - Movement for Growth (2016) and also the review that is currently underway. Sandwell's transport policies reflect the approach taken through this review. Policies in the Draft Plan set out the priorities for the development of the transport network, identifies where the development of the Key Route Network will be safeguarded, addresses the need for the efficient movement of freight and logistics, creates coherent cycling and walking networks, aims to influence travel choices, manages the parking network, plans appropriately for low emission vehicles and provides opportunities for digital connectivity.</p>
	<p>Page 12/13 under the section for the Vision and Ambitions of Sandwell Borough, we would welcome the inclusion of the historic environment within these sections and a recognition of the value of the historic environment in your area and how the Plan will provide a 'positive strategy' for the historic environment (National Planning Policy Framework, Paragraph 190).</p>	<p>Agreed</p>	<p>The Sandwell Vision to 2041 aims to reflect the borough's industrial and architectural heritage with a commitment to protecting Sandwell's historic buildings.</p>

	There is no reference to heritage within the more detailed vision on page 14.		
	<p>We welcome the reference to heritage within Objective 5 and 9 and consider that it would be beneficial to have a separate objective for the historic environment which is specific to the needs and challenges of the historic environment within the area. This can also filter through to a specific indicator for the historic environment within the Strategic Environmental Assessment/ Sustainability Appraisal process.</p> <p>Historic England considers that a strategic policy for the historic environment is essential. It may be that a specific one is required relevant to the issues within Sandwell Borough and considering the type of assets and challenges faced; equally it may be appropriate to incorporate a Black Country Wide policy depending on how appropriate this would be to your own context.</p>	Noted	Objective 4 and objective 5 of the draft plan are dedicated to the protection and enhancement of the historic environment. These objectives are backed up by a number of policies throughout the Draft Plan. In particular, chapter 4 - Sandwell's Natural and Historic Environment, contains four policies dedicated to the historic environment.
	<p>Local Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees. The Council is too dependent on online consultations, and should do more to contact community groups and organizations at an earlier stage so that plans can be changed in light of the comments received. Too often these consultations are only conducted after tentative plans have already been put in place, when they should be conducted while still exploring possibilities.</p> <p>The new Local Plan must balance the need for housing with protection of trees and green space that remove carbon dioxide and pollution particles from the atmosphere and release oxygen. So, we feel the new development plan should:</p> <ul style="list-style-type: none"> • Prioritise use of brownfield sites • Honour its commitment to reach carbon neutrality for Sandwell by 2041 	<p>Noted</p> <p>The consultations for the production of the Sandwell Local Plan are undertaken in accordance with the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework. The Council has also produced a Statement of Community Involvement (also in line with the regulations) that sets out how we will deliver community involvement and consultation. The Issues and Options stage of the plan-making process is the first part of the process and aims to engage local people and businesses in the process to enable them to</p>	The Draft Local Plan contains a number of policies to protect the natural environment and to mitigate against the impacts of climate change. The policies and proposals in the Draft Plan have been put together using examples taken from the Government's Planning Practice Guidance section on climate change which promotes low and zero carbon technologies, sustainable transport and the use of innovative design and energy production. The Plan also contains a policy that aims to decentralise energy networks within larger development sites and make more appropriate choices for heating and hot water systems. Managing heat and flood risk is also a key policy

	<ul style="list-style-type: none"> • Respect and preserve nature and conservation sites • Honour its obligation to improve air quality in the Borough. • Urge the WMCA and national government to support the release of brownfield sites and deter land banking by speculative property developers. • Prioritise affordable housing. • There should be neighbourhood plans in place to help ensure that communities can be as self-sufficient as possible. 	<p>set out the important issues they think the Local Plan should cover, prior to the Draft Plan being produced. These issues are then taken into account when producing the Draft Plan.</p>	<p>driver for the Plan. The Draft Plan also contains policies designed to secure the contribution of development towards the mitigation of and adaptation to, climate change. In addition, changes to Part L of the Building Regulations and the Future Homes Standard will govern carbon reduction in new developments. Policies for renewable energy are also included within the Plan.</p> <p>The Draft Plan contains policies to protect the borough's important nature conservation sites and to improve and enhance these areas. Access to open spaces is also an important thread throughout the Plan. The Draft Plan contains a policy that aims to improve air quality across the borough.</p> <p>With regard to affordable housing, the policy within the Draft Plan aims for 25% of new developments containing 10 units or more to be affordable housing. However, this is dependent on the viability of the site to be developed. 97% of Sandwell's new development is built on brownfield land which will have an impact on viability due to the impacts of the previous use and historic ground conditions.</p> <p>Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the</p>
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			development and growth of their local area. It is for the communities to take the opportunities offered by neighbourhood planning and the legislation enables a neighbourhood forum or a community organisation to do so. The Council will work with any appropriate organisation in the production of a neighbourhood plan.
	Object to Sandwell Council's decision to develop Brandhall Green Space (the former Brandhall Golf Course).	Noted. Sandwell Council granted outline planning permission for housing, a school and public open space at its meeting on the 25th October 2023.	No change
	Please save our Green belt and our trees.	Noted. The Draft Plan does not contain any proposals to build on the green belt in Sandwell.	The Draft Plan contains a policy for the maintenance of the green belt boundary and the protection of the area's nature conservation, landscape, heritage and agricultural value.
1) Questions – Vision and Objectives	<p>3. The HBF supports the need for the Vision for Sandwell to include reference to the need for new homes to meet housing need, as currently included within Ambition 7.</p> <p>4. The HBF agrees that the Council must consider the supply of housing land as a key part of the Local Plan. The Local Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver Sandwell's housing requirement. This sufficiency of Housing Land Supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (5YHLS) and achieve Housing Delivery Test (HDT) performance measurements.</p> <p>5. The HBF would support ambitious growth aspirations in Sandwell.</p>	Noted	<p>The Council acknowledges support for the Council's Vision for Sandwell to 2041. Policies in the Draft Plan set out the need to plan for both open market and affordable housing to meet housing needs.</p> <p>Policy SH01 – Delivering Sustainable Housing Growth, sets out how many dwellings will be provided during the plan period 2022-2041.</p>

	<p>6. The HBF would request that the Council considers the annual LHN as only the minimum starting point and fully considers all of the issues that may result in a need for a higher housing requirement.</p> <p>7. As the Local Plan will need to cover a period of 15 years from adoption, it will be important for the evidence base to be consistent with the Plan Period.</p>		
	<p>The WMHAPC believes one of the main issues that the Sandwell Local Plan should address is meeting Sandwell’s affordable housing needs in full. We therefore welcome Ambition 7.</p> <p>Similarly, the WMHAPC welcomes the vision for the Sandwell Local Plan, including to ensure “Affordable, social and council houses are available to those who need them.”</p> <p>The WMHAPC requests that the provision of affordable housing should be a key objective for both Sandwell Council and Sandwell Local Plan.</p>	Noted	Objective 6 in the Draft Sandwell Local Plan aims to address Sandwell’s wide-ranging housing needs by supporting the provision of new homes that includes a mix of housing type and tenure that meets the needs of all residents and is capable of being adapted to meet the future needs of the occupiers. The objective is backed up by policies in the Housing Chapter.
	<p>The SLP should prioritise the Borough’s chronic under-delivery of both market and affordable homes.</p> <p>The SLP must do more than the level of supply proposed by the BCP (the proposed supply in the draft plan represented just 34% of the Borough’s total needs) to address these significant issues, including making difficult decisions regarding releasing Green Belt land to meet these needs.</p> <p>The plan must prioritise the location of development in the most sustainable and accessible locations in order to contribute to healthier lifestyles (as per ambition 2 of the issues consultation and NPPF paragraph 105).</p>	<p>Noted.</p> <p>The Council acknowledges the comments made with regard to the under-delivery of both market and affordable homes and acknowledges the shortfall in housing land. The Council has made every effort to identify suitable housing sites to meet the calculated need for the borough in the most sustainable locations. The Council has chosen not to release green belt land in accordance with the NPPF. The green belt around Sandwell provides an important function in preventing Sandwell merging into</p>	No change

		Birmingham and protects the open space and countryside in this area.	
	<p>Wain Estates are supportive in principle of re-using appropriate, up-to-date evidence.</p> <p>The Council should however undertake fresh evidence in terms of assessing sites given the passage of time and in response to the site specific evidence that may have been submitted by landowners and promoters.</p> <p>The Council should therefore carefully consider which parts of the evidence base may need a refresh, particularly given the Borough's chronic housing pressures."</p>	<p>Noted.</p> <p>The Council has commissioned new / updated evidence where it is considered appropriate or where it is felt that the evidence is not up-to-date and will continue to do so.</p> <p>The NC survey process involves an on-site survey being undertaken and its findings sent to the landowner and also presented to the Local Sites Partnership where it will be scrutinised and either endorsed / not endorsed. The LSP comprises relevant officers from the local authorities, statutory agencies involved with nature conservation, including Natural England and other local organisations also with an involvement in nature conservation. Proposed sites for nature conservation are then adopted by the Council.</p> <p>Any proposed development sites are assessed against a site selection methodology which will be produced alongside the SLP.</p>	No change
	Vulcan is of the view that the objectives are generally sounds and supports the following objectives: 2, 4, 6, 7	<p>Support noted.</p> <p>Sandwell Council encourages the reuse of under-utilised land. 97%</p>	Policy SH03 – Housing Density, Type and Accessibility aims to address the delivery of housing to meet identified local needs.

	<p>Objective 3 which relates to housing is broadly supported, however, more specific referencing of the delivery of housing to meet identified local needs through reference to achieving the right housing mix, densities, tenures, and typologies would make the objective more focussed on what is needed locally.</p> <p>Objective 10 which relates to effective and prudent use of previously developed land and natural resources is broadly supported. However, reference to sites which are existing underutilised and/or ill-positioned may not appropriately serve its purpose anymore and that adaptability towards other uses such as housing would allow for flexibility.</p>	of new development has been built on previously developed land.	
What do you think are the main issues that the new SLP should address in Sandwell?	<p>All green spaces to be kept, and playing fields used for the benefit of the community. Support the use of brownfield sites before green field. This is an urban area and with a lot of residents not having access to gardens. This makes green space locally all the more vital.</p> <p>Any plans to develop and build on community green space should be open for consultation, and not underhand without local residents being aware.</p>	Noted	The Vision, aims and objectives and policies within the Draft Local Plan all support the protection and enhancement of green spaces, along with a brownfield first strategy for development. Any proposals for the development of Council-owned green space will be dealt with using the Council's own policies and procedures. Any applications for planning permission are dealt with using the latest regulations and the Council's Statement of Community Involvement.
	Conservation of existing green spaces, and full transparency by the local council when considering residents opinions.	Noted	The Vision, aims and objectives and policies within the Draft Local Plan all support the protection and enhancement of green spaces, along with a brownfield first strategy for development. Any proposals for the development of Council-owned green space will be dealt with using the Council's own policies and procedures. Any applications for planning permission are dealt with using the

			latest regulations and the Council's Statement of Community Involvement.
	<p>As 'The Friends of Sheepwash Local Nature Reserve', we believe that the current system in favour of presumed housing development is wrong.</p> <p>Don't agree with development on brownfield sites that have re-established as wildlife sites.</p> <p>Sandwell has too little open space left.</p> <p>Too many houses are being built near to sites like Sheepwash and wildlife corridors are being destroyed by new metro lines and other transport links. Sites like ours should extend into the former industrial land that has rewilded.</p>	<p>Noted.</p> <p>The NPPF requires the development of brownfield land first. Nature Conservation surveys have been undertaken on sites of potential interest for nature conservation and where development sites are proposed next to, or near to nature conservation sites, policies within the plan will seek to mitigate against any damage and expect designs to take account of sensitive uses.</p>	<p>Policies are included in the Draft Local Plan that seek to protect and improve existing green space and also create new green spaces where appropriate.</p>
	<p>The plan should aim to ensure that Sandwell is able to accommodate as much housing and employment (classes E(g)(ii)/(iii), B2 and B8 and related uses) as possible to meet its own needs and contribute to meeting the needs of neighbouring areas in Birmingham and the Black Country. This should be achieved by making effective use of land, including land that may be surplus to requirements for other purposes, and maximising densities.</p>	<p>Noted.</p> <p>The Draft Plan aims to identify as much land as possible to meet its own needs. Where this has not been possible, the Council has entered into discussions with neighbouring authorities with a view to receiving contributions towards any shortfall.</p>	<p>No change</p>
	<p>Areas of nature conservation should be preserved in full.</p> <p>Brownfield sites should be redeveloped regardless of cost.</p> <p>Employment use should be reassessed for housing.</p> <p>Sandwell is one of the most deprived boroughs and it should put people first.</p>	<p>Noted.</p> <p>Much of Sandwell's new development (97%) is on previously used land. All brownfield land is considered appropriate for development but is dependent on viability. All brownfield land in the Borough has been assessed for alternative uses, including moving from employment land to housing.</p>	<p>The Draft Plan contains policies that will protect important areas for nature conservation and for the creation of new areas.</p>

	<p>Crime and anti-social behaviour must be addressed in Sandwell with a far more proactive and hard approach required from Sandwell MBC to eradicate these from people both living and working in the borough. Sandwell MBC needs to deal with the issues and prosecute repeat offenders.</p>	<p>Noted. Sandwell Council acknowledges the comments with regard to crime and anti-social behaviour. However, the Draft Plan is unable to deal with issues around prosecuting offenders and eviction from properties.</p>	<p>However, the Draft Plan does aim to ensure decent housing for all, access to employment and the provision of a high-quality environment. A key objective for new developments is that they create safe and accessible environments where crime and the fear of crime and anti-social behaviour do not undermine quality of life, health or community cohesion.</p>
	<p>Option B - A new vision specifically for the Local Plan and the plan period it will cover along the lines of the suggested wording should be used as the basis for preparing the SLP.</p> <p>A principal issue to be addressed by the new SLP is future housing supply and delivery to meet local needs in a sustainable manner across the Borough. Existing underutilised and/or ill-positioned employment sites may be adaptable towards other uses such as housing, in sustainable, accessible locations. Need to meet modern employment needs in better, more accessible locations across the borough. The spatial strategy needs to consider the housing and employment relationship to ensure both needs are met across the plan period.</p>	<p>The Plan also addresses the issue of future land supply for employment and housing. A number of sites have been identified and assessed for suitability for either employment or housing uses. The spatial strategy does consider the relationship between employment and housing and the need to ensure that needs are met where possible.</p>	<p>The Draft Plan contains a new Vision for the Borough to 2041.</p>
	<p>The delivery of sufficient housing to meet local housing needs is a key issue for the SLP, particularly taking into account Sandwell Council's aim to support regeneration, business investment and job creation to maintain and grow in the local. The creation of more local jobs will result in the need for further local housing.</p>	<p>Agreed.</p>	<p>The Plan addresses the issue of future land supply for employment and housing. A number of sites have been identified and assessed for suitability for either employment or housing uses. The spatial strategy does consider the relationship between employment and housing and the need to ensure that needs are met where possible.</p>

	<p>The emerging Sandwell Local Plan should continue to prioritise the release of brownfield land for development as promoted under the former draft Black Country Plan.</p> <p>Opportunities for densification of existing brownfield sites in locations well served by public transport should clearly be maximised wherever possible.</p> <p>The redevelopment of the Chance Glassworks Site offers the opportunity for the Council to deliver a significant number of dwellings, employment land and cultural space within the urban area, close to public transportation.</p> <p>The emerging Local Plan should therefore provide a supportive policy environment which enables the Site to come forward for sensitive heritage restoration.</p>	<p>Noted.</p> <p>The Draft Plan sets out a proposed strategy for balanced green growth across the plan period. This includes maximising opportunities for developing under-used brownfield sites, increasing densities in sustainable locations. The Council will welcome any proposals for the redevelopment of Chances Glassworks.</p>	<p>The Draft Plan includes policies that support the regeneration of our heritage assets and sets out a number of regeneration areas that include heritage assets.</p> <p>Chances Glassworks has been allocated as a mixed-use site in the Draft Plan. The allocation consists of approximately 276 homes, 7208sqm of workspace, a 779sqm heritage centre, 1ha of open space.</p>
	<p>The emerging Sandwell Local Plan should continue to prioritise the release of brownfield land for development as promoted under the former draft Black Country Plan.</p> <p>Opportunities for densification of existing brownfield sites in locations well served by public transport should clearly be maximised wherever possible.</p> <p>To bring brownfield sites such as the Soho Foundry and Mint forward for development, the emerging Local Plan must provide explicit policy support for heritage regeneration.</p> <p>The emerging Local Plan should therefore provide a supportive policy environment which enables the Site to come forward for sensitive heritage restoration.</p>	<p>Noted.</p> <p>The Draft Plan sets out a proposed strategy for balanced green growth across the plan period. This includes maximising opportunities for developing under-used brownfield sites, increasing densities in sustainable locations. The Council will welcome any proposals for the redevelopment of the Soho Foundry and Mint site.</p>	<p>The Draft Plan also includes policies that support the regeneration of our heritage assets and sets out a number of regeneration areas that include heritage assets.</p> <p>Soho Foundry and Mint has been allocated as an employment site in the Draft Sandwell Local Plan.</p>
<p>Please indicate which option you think should be used as the</p>	<p>Option B - a new plan with consideration and full consultation of local residents.</p>	<p>Noted.</p> <p>The Draft Plan has been produced in response to the comments of residents following the</p>	<p>No change</p>

basis for preparing the SLP Vision		consultation held in February/March 2023.	
	Option B	Noted. The Draft Plan has been produced in response to the comments of residents following the consultation held in February/March 2023.	No change
	Option B. The Sandwell vision does not include any vision for nature and wildlife, and this was raised at workshops with the council which we attended.	Noted	The Vision for Sandwell contained in the Draft Plan now includes the importance of nature conservation and the natural environment.
	Sport England supports the creation of a new Vision, and in particular the reference included to the role of open spaces, green networks etc to living active lifestyles and the promotion of healthy lifestyle choices. This aligns well with Sport England's strategy Uniting the Movement and to our Active Environments Big Issue.	Noted	A new Vision has been created for the Draft Local Plan
	Option B. The SLP objectives should support the wider vision but focus on relevant aspects within the scope of the town planning system. Need updated demographic evidence using the 2021 Census. Understanding of traffic flows to town centres and major employment areas.	Noted. The 2021 Census figures have been used where available and when appropriate.	No change
	Option B	Noted	A new Vision has been created for the Draft Local Plan
	Option B - The Sandwell Vision should be on the basis of preparing the Local Plan, bearing in mind that it will be for the Local Plan to establish a sustainable strategy for the protection of the environment.	Agreed	Please refer to the Spatial Strategy document.
	Option B: Create a new vision specifically for the Local Plan.		Noted - a new Vision has been created for the Draft Local Plan
	Option B: Create a new vision specifically for the Local Plan and the plan period it will cover.	Noted	A new Vision has been created for the Draft Local Plan

	Wain Estates support the creation of a specific vision for the SLP (Option B) as the plan should be responding to a long-term, up to date vision which reflects the entire plan period up to 2041.		
	Support Option B	Noted	A new Vision has been created for the Draft Local Plan
If you think the SLP should include a new Vision (along the lines of the suggested wording above), do you think the Vision should cover any other issues?	Retain and protect green space from development Whilst it is nice to have facilities such as Sandwell Valley, this does not replace the need for locally accessed space for residents who don't drive, and also elderly who can just walk short distance. Grass roots sports are a vital outlet and should be supported."	Comments noted	The Draft Local Plan contains policies and proposals for the protection of green spaces and sports facilities where appropriate.
	Retention of green spaces at all times. We live in an urban area that is 'full'. Smaller parks are important for the communities who do not live near to the bigger facilities.	Comments noted	The Draft Local Plan contains policies and proposals for the protection of green spaces and sports facilities where appropriate.
	1 Wildlife habitat management and creation. 2 Creation of ponds and wet meadow areas. Not building on former landfill sites known to be contaminated.	Comments noted	The Vision for Sandwell contained in the Draft Plan includes the importance of nature conservation and the natural environment.
	Para 2, sentence 2 of the suggested vision should read natural and historic environment	Comments noted	The Vision for Sandwell has been revised for the Draft Plan and include the importance of nature conservation and the natural environment.
	The environment should be the main concern and ALL opportunities for promoting physical health and mental well- being should be paramount.	Comments noted	The Vision for Sandwell has been revised for the Draft Plan and includes the importance of nature conservation and the natural environment.
	Liaising with neighbouring authorities under Duty to Cooperate protocols.	Noted. The Council is continuing to liaise with neighbouring authorities under the Duty to Co-operate.	No change

	<p>The SLP objectives should support the wider vision but focus on aspects within the scope of the town planning system.</p>	<p>Noted. The Council is following the appropriate Planning regulations when putting together the Local Plan. The Council is of the view that the objectives, as set out within the Draft Local Plan, do support the wider Vision.</p>	<p>No change</p>
	<p>In principle, the proposed new vision is supported. The housing section should be expanded to include specific reference to and a statement that the delivery of housing to meet identified local needs is a priority.</p> <p>It is considered that there needs to be an appreciation that some existing underutilised and/or ill-positioned employment sites may not appropriately serve its purpose anymore and that site adaptability towards other uses such as housing may be the best approach. Vulcan suggests this should be included in the new vision.</p>	<p>Noted. Whilst the comments made are valid for the Plan as a whole, the Vision sets out how we would want the borough to look in 2041. It is the intention that the policies and proposals in the Plan will cover all of these elements and help us to achieve this Vision. In particular, policies contained within the Housing, Employment and Environment chapters aim to ensure the appropriate delivery of housing and employment to achieve the Vision.</p>	<p>No change</p>
<p>Once you have had a look at the issues raised in this document, please let us know your thoughts on the following overall matters</p>	<p>The issues raised are a reasonable summary. More transparency is required however. Further consideration to impact on local communities. No further out of town shopping complexes should be developed which will impact on local residents.</p>	<p>Noted. The Local Plan making process aims to ensure that the communities in Sandwell are engaged and their views taken into account. The Issues and Options consultation aims to identify those issues that are important to local communities so that we can include policies and proposals in the plan to address them, for example protection and</p>	<p>No change</p>

		<p>enhancement of green spaces and nature conservation.</p> <p>The Draft Plan does not contain any proposals for out of town shopping complexes.</p>	
	<p>Topics seem to be ones that should be considered. Full transparency is required however, and not sure how destruction of open space would support carbon footprint, or the environment.</p> <p>The roads are chaotic at the moment and this needs serious consideration if any further building plans are made. There seems to be some more concern about plans for Lion Farm Playing Fields. Nothing seems to have been made public to concerned residents. Any building on this land despite being a travesty would cause chaos locally as the new ambulance station has had a serious impact.</p>	<p>Noted.</p> <p>The Local Plan making process aims to ensure that the communities in Sandwell are engaged and their views taken into account. The Issues and Options consultation aims to identify those issues that are important to local communities so that we can include policies and proposals in the plan to address them, for example protection and enhancement of green spaces and nature conservation.</p>	<p>The Draft Plan contains policies and proposals that aim to improve the situation on the borough's road network.</p> <p>The Draft Plan also contains a list of proposed site allocations that the Council will welcome comments on.</p>
	<p>The areas appear to be in favour of presumed development, rather than the capacity which the borough can realistically accommodate. What is the figure the council puts on sustainable population within the borough and the eventual conclusion that it is already beyond that which it can sustain?</p>	<p>Noted.</p> <p>The housing need for the borough is calculated using a formula set out by the Government. There is not enough land within the borough to accommodate all of this need and so we have allocated sites where they are available and are working with neighbouring authorities to discuss the possibility of them meeting some of Sandwell's unmet need.</p>	<p>No change.</p>
	<p>Support provided to inclusion of policies relating to sport and physical activity, using the evidence in the Council's new playing pitch and outdoor sports strategy, and the proposed approach to using our Active Design Guidance</p>	<p>Support noted</p>	

	<p>Lockdown / Covid has changed forever our views on the environment and priorities need to change to reflect how communities have been affected. Plans should not all be about growth and industry /employment.</p> <p>Topic areas and issues are fairly robust but environmental themes should run through all of them. Evidence and views of the local communities should be listened to and accepted rather than ignored as they are the people who live in the borough.</p>	<p>Noted and agreed.</p> <p>The Council agrees that Covid has changed views on the importance of open space in the community and has included policies and proposals within the Plan to reflect this.</p> <p>The environment and climate change are key themes within the Plan.</p> <p>The Council have used the information provided through this consultation to inform the policies and proposals in the Draft Plan</p>	<p>The Draft Plan contains policies and proposals that reflect the importance of open space to the borough.</p>
<p>Should the Sandwell Local Plan: Promote higher levels of development to support economic growth; or plan for the minimum necessary to help meet the needs of our population?</p>	<p>Minimum necessary to meet the population needs.</p>	<p>Noted.</p> <p>The Council has made provision for 11,167 net new homes over the period 2022-2041. However, this does not meet the calculated need of 29,773 which is unachievable and doesn't achieve balanced growth. (Please refer to the Spatial Strategy for further information).</p>	
	<p>Minimum necessary.</p>	<p>Noted.</p> <p>The Council has made provision for 11,167 net new homes over the period 2022-2041. However, this does not meet the calculated need of 29,773 which is unachievable and doesn't achieve balanced growth. (Please refer to the Spatial Strategy for further information).</p>	<p>No change</p>
	<p>Plan for the minimum necessary.</p>	<p>Noted.</p>	<p>No change</p>

		The Council has made provision for 11,167 net new homes over the period 2022-2041. However, this does not meet the calculated need of 29,773 which is unachievable and doesn't achieve balanced growth. (Please refer to the Spatial Strategy for further information).	
	The plan should promote higher levels where this will contribute to meeting identified needs in the Black Country and Birmingham that cannot be accommodated in the neighbouring authority areas.	Noted. The Council has made provision for 11,167 net new homes over the period 2022-2041. However, this does not meet the calculated need of 29,773 which is unachievable and doesn't achieve balanced growth. (Please refer to the Spatial Strategy for further information). However, the Council will continue to liaise with neighbouring authorities (Duty to Co-operate) with a view to achieving a contribution towards the Council's unmet housing need.	No change.
	Minimum necessary	Noted. The Council has made provision for 11,167 net new homes over the period 2022-2041. However, this does not meet the calculated need of 29,773 which is unachievable and doesn't achieve balanced growth. (Please refer to the Spatial Strategy for further information).	No change
	minimum necessary to help the needs of the local population	Noted. The Council has made provision for 11,167 net new homes over the period 2022-2041. However, this	No change

		does not meet the calculated need of 29,773 which is unachievable and doesn't achieve balanced growth. (Please refer to the Spatial Strategy for further information).	
	SMBC should take into account the local plan tests of soundness, which currently sets out that plans should be positively prepared in providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet demand from neighbouring authorities is accommodated where practical to do so and is consistent with achieving sustainable development (paragraph 35 of the NPPF). In view of the current consultation on changes to the NPPF, SMBC should take account of the most up to date national policy position in respect of this matter.	Noted. The Council has made provision for 11,167 net new homes over the period 2022-2041. However, this does not meet the calculated need of 29,773 which is unachievable and doesn't achieve balanced growth. (Please refer to the Spatial Strategy for further information). However, the Council will continue to liaise with neighbouring authorities (Duty to Co-operate) with a view to achieving a contribution towards the Council's unmet housing need.	No change
	Vulcan is of the view that planning for the minimum necessary is not sufficiently ambitious. The new local plan should seek to promote higher levels of development to meet local needs, and to encourage growth through building new homes and delivering economic investment, including direct and indirect investments over the plan period.	Noted. The Council has made provision for 11,167 net new homes over the period 2022-2041. However, this does not meet the calculated need of 29,773 which is unachievable and doesn't achieve balanced growth. (Please refer to the Spatial Strategy for further information). However, the Council will continue to liaise with neighbouring authorities (Duty to Co-operate) with a view to achieving a contribution towards the Council's unmet housing need.	No change

	Yes - Promote higher levels of development to support economic growth	Noted. The Council has made provision for 11,167 net new homes over the period 2022-2041. However, this does not meet the calculated need of 29,773 which is unachievable and doesn't achieve balanced growth. (Please refer to the Spatial Strategy for further information). However, the Council will continue to liaise with neighbouring authorities (Duty to Co-operate) with a view to achieving a contribution towards the Council's unmet housing need.	No change
Do you think the SLP should be valid until 2041 or should it run for longer?	I don't think it should run for longer at this stage, which will allow further consideration for future changes in society and ongoing assessment of the population needs.	Agreed. The Plan period is 2022-2041	The Plan period is 2022-2041
	It needs reviewing at an earlier date.	Noted The Plan period is 2022-2041. Under the current plan-making regulations the Local Plan must be reviewed every 5 years.	No change
	Until 2041 only.	Agreed	The Plan period is 2022-2041.
	2041	Agreed	The Plan period is 2022-2041.
	No, the plan should be reviewed no later than 2041 as the planet is constantly changing and therefore priorities are constantly changing too!	Agreed. Under the current plan-making regulations the Local Plan must be reviewed every 5 years.	The Plan period is 2022-2041.
	It should run for longer. Tackling the complicated legacy left by two centuries of mineral extraction, landfill, contamination, and layers of reuse will take a long time. Major industries developed along railways and canals, while smaller factories and yards were intermingled with housing.	Not agreed. Under the current plan-making regulations the Local Plan must be reviewed every 5 years.	The Plan period is 2022-2041.

	<p>Although large areas have been reclaimed and reused, many remain. This history has left an incoherent urban sprawl, criss-crossed with linear barriers to movement to local movements of goods and people within the borough. Tackling this legacy, and the resulting congested traffic network, jumbled urban structure and complex ownership requires strategic long-term planning. New Square is a good example of the sustained effort needed to achieve transformational change, and this only one scheme. Unfortunately, there are also many examples of small-scale piecemeal developments which have prejudiced bigger transformational changes."</p>		
	<p>As set out in paragraph 22 of the NPPF, strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities in the area. Using 2041 as the plan period assumes that the SLP will be adopted by 2026. While this ambitious target for adoption is welcomed it is noted that it may not be achievable. As this is the very minimum plan period required, there would be merit in extending the plan period date to allow for any potential slippage in time taken to adopt the local plan. Where appropriate, policies should also consider development beyond the plan period.</p>	<p>Not agreed. Under the current plan-making regulations the Local Plan must be reviewed every 5 years.</p>	<p>The Plan period is 2022-2041.</p>
<p>What are your thoughts on the draft objectives?</p>	<p>I am not sure how destruction and building on green spaces can support carbon reduction particularly when roads are gridlocked around e.g., Brandhall Green Space and Lion Farm Fields. Local residents do not support this but are being ignored.</p>	<p>Noted. There are no objectives for the destruction and building on green spaces within the Draft Plan</p>	<p>No change</p>
	<p>I am concerned where building and construction removes green space from local residents</p>	<p>Noted. The Plan does not contain any objectives to remove green space</p>	<p>No change</p>
	<p>Objectives contradict each other and objective 9 appears to be a token one. Sandwell's open spaces are clearly not being protected- such as Lion Farm Fields as well as proposals on Land adjoining Sheepwash at Rattlechain.</p>	<p>Disagree. The Council does not agree that the objectives within the Issues and Options document contradict each other, or that the objective to protect and improve the environment is a token one.</p>	<p>The Draft Plan contains a number of objectives that include the protection and enhancement of Sandwell's natural environment, natural resources, biodiversity and countryside.</p>

		The Plan supports balanced green growth and aims to provide sufficient land for housing and employment growth while protecting the environment.	
	Objective 9 should be amended to read- "rich historic environment." The word "built" should be deleted because the historic environment includes historic landscapes and archaeological sites as well as buildings	Noted	Objective 9 is now objective 4 within the Draft Plan and refers to places, buildings, parks, scheduled monuments and their settings
	DMBC considers that a reference to an objective around the need to engage with neighbouring authorities under Duty to Cooperate protocols should be included.	Disagree. The Council does not believe that an objective is required for DtC as it is currently a statutory duty.	No change
	Objective 3 seeks to address Sandwell's identified and wide-ranging housing needs by providing high-quality new homes to meet the future needs. This objective is welcomed.	Noted	
	In general, the objectives cover the majority of topic areas that a new Local Plan should be advocating. However, they do not include any objectives to support heritage regeneration outside of town centres and given Sandwell's significant industrial history, it is considered that this is a missed opportunity. It is recommended that an explicit heritage led regeneration objective is included within the Draft Local Plan.	Noted	Objective 9 is now objective 4 within the Draft Plan and refers to places, buildings, parks, scheduled monuments and their settings in all areas of the borough
	In general, the objectives cover the majority of topic areas that a new Local Plan should be advocating. However, they do not include any objectives to support heritage regeneration outside of town centres and given Sandwell's significant industrial history, it is considered that this is a missed opportunity. It is recommended that an explicit heritage-led regeneration objective is included within the Draft Local Plan.		Objective 9 is now objective 4 within the Draft Plan and refers to places, buildings, parks, scheduled monuments and their settings in all areas of the borough
2) Questions – Strategic Policies	8. There is a need to address issues that are wider-than-local matters in a joined-up manner under the Duty to Cooperate. The HBF notes the Council's decision that there is merit in retaining and adapting some of the draft BCP policies for our new	Noted. Sandwell will continue to be involved in DtC discussions with both neighbouring authorities and across the HMA.	No change.

	<p>Local Plan in Sandwell. However, the Council will need to ensure that the evidence that supports this approach, is, and remains, up to date and covers the whole of the Plan period.</p> <p>In order to ensure delivery of any unmet housing needed in neighbouring authorities, neighbouring authorities will need clarity about the level of unmet need that they are being required to accommodate. This will be essential in order for neighbouring authorities to properly consider how to meet this element of unmet need within their Plans, and to demonstrate compliance with the Duty to Cooperate.</p>		
	<p>The WMHAPC advises that if the Council is looking to retain any of the draft BCP policies, it must ensure that these policies remain sound and fully justified in the context of Sandwell over the proposed Local Plan period. The need for affordable housing in the Borough cannot be understated and it is necessary to ensure the appropriate provision is provided.</p>	<p>Noted. All former BCP policies have been assessed and those included are considered to be sound policies. The need for affordable housing has also been addressed within the Draft Plan</p>	<p>No change</p>
	<p>West Midlands Police made a number of comments on the following policies in the BCP:</p> <ul style="list-style-type: none"> Policy CSP4 - Achieving well-designed places Policy CSP5 - Cultural Facilities and the Visitor Economy Policy HW1 – Health and Wellbeing Policy HOU4 – Accommodation for Gypsies and Travellers and Travelling Show people Policy HOU6 – Houses in Multiple Occupation Policy CEN1 – The Black Country Centres Policy ENV7 – Canals Policy ENV9 – Design Quality Policy DEL1 – Infrastructure Provision 	<p>Noted</p>	<p>Comments received at the Reg18 Draft BCP consultation have been taken into account when producing the policies for the Draft Sandwell Local Plan. BCP policies have been updated and incorporated where appropriate.</p>
<p>Do you agree with the Council's decision to incorporate some of the former BCP policies into the SLP,</p>	<p>It does make sense to incorporate some former BCP policies. I am not clear why any responses from previous consultations cannot be carried forward to this review.</p>	<p>Noted</p>	<p>BCP policies have been updated and incorporated where appropriate.</p>

<p>to benefit from the work already done on them and to make it potentially easier for the four Black Country councils to address certain wider than local matters in a joined up manner?</p>			
	<p>I think it makes sense to incorporate some of them.</p>	<p>Noted</p>	<p>BCP policies have been updated and incorporated where appropriate</p>
	<p>"Yes, those affecting nature conservation. Policy ENV2 - Development Affecting Special Areas of Conservation (SACs) Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain Policy ENV4 – Provision, retention and protection of trees, woodlands and hedgerows"</p>	<p>Noted</p>	<p>BCP policies have been updated and incorporated where appropriate</p>
	<p>"Sport England has worked closely with Black Country Council's in respect of several strategic policies for the BCP review, and would wish to see the following policies incorporated in the Sandwell Plan: DEL1: Infrastructure Provision HW1: Health and Well-Being ENV8: Open Space and Recreation ENV9: Playing Fields and Sports Facilities This would be subject to addressing Sport England's representations on these policies made previously. This would ensure that the policies in the plan align with the Council's evidence base for sport, including the completed PPOSS."</p>	<p>Noted</p>	<p>BCP policies have been updated and incorporated where appropriate</p>
	<p>Agree, as they deal with strategic cross-boundary issues</p>	<p>Noted</p>	<p>BCP policies have been updated and incorporated where appropriate</p>
	<p>Some of the BCP policies should be included, but they need to be carefully reviewed to make sure that they are worded in a way that makes them Sandwell-specific, because the existing policies were intended for all four Boroughs</p>	<p>Noted</p>	<p>BCP policies have been updated and incorporated where appropriate</p>

	DMBC generally agrees with the approach of using, adapting and apportioning the evidence base and draft policies of the Black Country Plan (BCP- Regulation 18 consultation draft, 2021) to address sub-regional strategic planning issues, but also to fit with meeting local needs and addressing local planning issues in general. DMBC are likely to adopt a similar approach with our forthcoming Local Plan.	Noted	BCP policies have been updated and incorporated where appropriate
	yes major proposed development at Lion Farm Fields, Brandhall Golf Course need to be revisited as procedures / policies were incorrectly followed.	Disagree. The Sandwell Local Plan has been produced in line with the appropriate Planning regulations	No change
	TRAN should be included given the cross-border nature of transport issues and opportunities	Noted	BCP policies have been updated and incorporated where appropriate.
	DMBC generally agrees with the approach of using, adapting and apportioning the evidence base and draft policies of the Black Country Plan (BCP- Regulation 18 consultation draft, 2021) to address sub-regional strategic planning issues, but also to fit with meeting local needs and addressing local planning issues in general. DMBC are likely to adopt a similar approach with our forthcoming Local Plan.	Noted	BCP policies have been updated and incorporated where appropriate.
	Policy EMP4 – Other Employment Sites. This identifies sites which would be suitable for housing, without prejudicing investment in improvements for employment. Policy ENV7 – Canals. Recognizes the importance of enhancing the canals and their surroundings.	Noted	BCP policies have been updated and incorporated where appropriate.
	"Whilst prepared in a sub-regional context, the former BCP is a recently drafted development plan document prepared in the context of national planning and guidance which is currently not materially changed. Furthermore, a number of the policies in the former BCP were underpinned by an evidence base that in large parts remains up-to-date and robust, and of course many are directly relevant to Sandwell Borough. Where BCP policies can be recycled, it is logical and justified for this to happen.	Noted	BCP policies have been updated and incorporated where appropriate.
	Any of the draft BCP policies which are proposed to be incorporated into the draft SLP when it is published for public	Noted	BCP policies have been updated and incorporated where appropriate. The

	consultation will need to be supported by appropriate up to date evidence, which is applicable to Sandwell and it specific a context.		evidence base has been updated where necessary and will be published alongside the Draft Plan.
	We strongly agree with incorporating some of the former BCP policies into the new Sandwell Local Plan to get leverage the existing evidence base. This will help ensure the timely adoption of Sandwell's own Local Plan in order to support growth within the District.	Noted	BCP policies have been updated and incorporated where appropriate. The evidence base has been updated where necessary and will be published alongside the Draft Plan.
	We strongly agree with incorporating some of the former BCP policies into the new Sandwell Local Plan. Concerned about the allocation of the Soho Foundry and Mint site as a Local Employment Area and the limited ability this policy position creates to secure the most appropriate use/s that would enable the regeneration and re-use of the site.	The site was assessed as part of the Black Country Employment Area Review (BEAR) and the score it received meant that it was suitable for allocation as a local employment site that will provide for the needs of locally-based investment, safeguarded for a variety of employment uses (see Policy SEC3 – Local Employment Areas).	No change

Tackling Climate Change			
Enhancing the Built and Natural Environment			
Main heading or question number	Support	Object	Comment
3. TACKLING CLIMATE CHANGE	0	0	2
3) Climate Change	0	0	2
How should we address the climate crisis in the Local Plan Review – what should be our priority or priorities?	0	0	9
How else can new development reduce greenhouse gas emissions and respond to the climate crisis?	0	0	2

Tackling Climate Change			
Enhancing the Built and Natural Environment			
Main heading or question number	Support	Object	Comment
Should the new plan leave the issue of carbon reduction in new buildings to other relevant legislation rather than making its own provision – i.e., should the plan not include policies on carbon reduction but instead wait for emerging Building Regulations legislation to become law?	0	0	4
How would you feel about building extensions and alterations to your property that were more climate-change adapted and low carbon?	0	0	2
What potential sources of renewable energy should the Council be looking at supporting in its local plan policies	0	0	2
4) Heat Networks	1	1	
Do you agree that Sandwell Council should support the development and delivery of heat networks as part of its own building proposals, to help deliver Net Zero construction?	2		
Do you think the Council should require private sector and other developers to make provision for heat networks, particularly on larger sites?	1	1	0
5) Resilient Landscapes	0	0	1
How should we ensure new development is able to withstand climate change and provide a comfortable living and working environment for people?	0	0	1
What should be our priorities when considering new design and landscaping to help us cope with climate change?	0	0	3
Apart from not building on or near them, how should we protect the open spaces, parks, countryside and ecology of Sandwell?	0	0	4
6) Sustainable Drainage	0	0	1
How should the Local Plan Review best manage flood risk whilst still achieving the growth that is needed to make Sandwell successful?	0	0	2
Do you think the SLP needs a policy to identify an acceptable rate of run-off for new developments, or is this covered in sufficient detail in the Black Country Local Standards for SuDS (BCP evidence base)?	0	0	1
Do you think the SLP: - <ul style="list-style-type: none"> • should include details of the type of SuDS that the Council would prefer to see delivered; • should require SuDS schemes but leave details to developers to propose; 	0	1	1

Tackling Climate Change			
Enhancing the Built and Natural Environment			
Main heading or question number	Support	Object	Comment
<ul style="list-style-type: none"> should not require SuDS but allow for alternative drainage schemes to be implemented? 			
12. ENHANCING THE NATURAL AND BUILT ENVIRONMENT	0	0	12
46) Biodiversity Net Gain	1	0	2
Do you think the SLP should contain a policy on retaining offsite biodiversity net gain in Sandwell?	1	1	3
If so, how do you think the Council should achieve this?	0	1	2
<p>Please identify which of the following options you prefer; you can pick as many as you like or suggest something different.</p> <ul style="list-style-type: none"> i. Identify privately-owned sites as receptors for BNG credits and allocate them in the SLP? ii. Identify Council-owned sites as receptors for BNG credits and allocate them in the SLP? iii. Support wider landscape-scale schemes such as the Natural England Purple Horizons project (restoring and connecting fragmented heathlands to create a mosaic of heathlands, wetlands, woodlands and grasslands between Cannock Chase and Sutton Park) that are nearby but not necessarily in Sandwell itself? iv. A combination of private and public approaches? v. Something else (please specify)? 	0	0	0
<p>Are you the owner of any sites or land within Sandwell that you think may be suitable for allocation as a potential receptor site for biodiversity net gain (bearing in mind it would then be protected from further development or change for at least 30 years, through a covenant agreement)?</p> <p>If so, would you be willing to have your site allocated for this purpose in the SLP (assuming it was considered suitable after an ecological assessment)?</p>	0	0	0
Do you think we should explore a requirement for additional biodiversity net gain credits (e.g. more than 10% minimum) should developers be proposing to purchase them for schemes outside Sandwell?	0	1	1
47) Green Spaces			
Do you agree with this proposal?	1	1	2
48) The Rowley Hills			
The Rowley Hills have been protected to date from development that might have affected its visual, historic and ecological amenity. They are subject to a variety of policies / allocations that have prevented most inappropriate development from taking place.	1	0	1

Tackling Climate Change			
Enhancing the Built and Natural Environment			
Main heading or question number	Support	Object	Comment
<ul style="list-style-type: none"> Do you think the current level of protection is sufficient to continue safeguarding the distinctive character, environment and visual amenity of the Hills? Do you think the level of protection needs to be increased? Do you think there is scope for any residential or economic development in the area, assuming it did not have an impact on the Hills' ecology, historic character, geological importance or skyline? If so, what sort / level of development would be appropriate in your view and why? 			
<p>Do you think the Rowley Hills should be allocated as Local Green Space in the SLP?</p> <ul style="list-style-type: none"> Can you explain why you think it should be? If you disagree, can you explain why you think it doesn't need this designation? 	0	0	2
<p>Do you think the Rowley Hills should be designated as green belt?</p> <ul style="list-style-type: none"> Can you explain why you think it should be? If you disagree, can you explain why you think it doesn't need this designation? 	0	1	1
49) Heritage Assets			
Do we need to prepare a policy to support the adoption of a Sandwell Local List of buildings of historic / architectural merit?	2	0	2
Do we need to prepare a new policy to address the safeguarding of heritage assets when mitigating against and adapting to the climate change emergency?	1	0	0
Do we need to consider the introduction of special controls that prevent the demolition of non-designated, locally important heritage assets?	2	0	2
50) Conservation Areas			
<p>Some of the conservation areas in Sandwell are in centres where there is or has been a lot of pressure for development and growth. As a result, any previous appraisals (undertaken when they were first designated) are likely to be out of date. Other conservation areas are unlikely to have changed much since they were first adopted.</p> <p>Do you think the Council should: -</p> <ul style="list-style-type: none"> undertake a review of all conservation areas whether they have been subject to any development pressure or not; 	0	0	3

Tackling Climate Change			
Enhancing the Built and Natural Environment			
Main heading or question number	Support	Object	Comment
<ul style="list-style-type: none"> undertake comprehensive appraisals of those conservation areas where there has been a significant amount of development or other physical changes (such as new infrastructure or changes to road layouts, etc.), to ensure the appraisals remain relevant and up to date for use in making decisions on planning applications; leave the current conservation area appraisals as they are and accept that the contribution the appraisals can make to the determination of planning applications and appeals will be limited? 			
Do you think the Council should also be exploring: - <ul style="list-style-type: none"> whether there are any new conservation areas that could be designated; or whether any current conservation areas no longer carry sufficient interest and importance to be retained as a conservation area? Do you know of any areas of historic interest in your local area that you think could be made into a conservation area? 	1	0	0
51) Archaeology			
Do you agree with the proposal to update the existing SAD policy on archaeology?	1	0	0
52) Global Geopark			
Do you agree with the proposal to include a policy on the Black Country Global Geopark?	1	0	1
Are you aware of any features of geological interest in your area that you want to bring to our attention?	0	0	1
TOTAL	16	8	72

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
2. Tackling Climate Change	Councils do not need to set local energy efficiency standards in a Local Plan policy - higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.	The Council will ensure its policies do not repeat other legislation.	Policy SCC1 – Increasing efficiency and resilience Policy SCC2 – Energy Infrastructure Policy SCC3 – Managing Heat Risk Policy SCC4 – Flood Risk Policy SCC5 - Sustainable drainage and surface water management Policy SCC6 – Renewable and Low Carbon Energy and BREEAM Standards
2. Tackling Climate Change	<ul style="list-style-type: none"> • Transport must play a major role in reducing the effects of climate change by rapidly reducing transport carbon emissions at a rate at least consistent with carbon targets. • Plan should ensure that the relationship between spatial plans and transport is co-ordinated. 	Comments noted	Policy SCC1 – Increasing efficiency and resilience Policy SCC2 – Energy Infrastructure Policy SCC3 – Managing Heat Risk Policy SCC4 – Flood Risk Policy SCC5 - Sustainable drainage and surface water management Policy SCC6 – Renewable and Low Carbon Energy and BREEAM Standards
3) Questions – Climate Change	Plan should recognise the role of the natural environment on reducing effects of climate change. Factors exacerbating climate change should be avoided and the natural environment's resilience to change should be protected.	The SLP contains several policies on climate change and the natural environment that seek to alleviate and mitigate the impacts of climate change.	Policy SCC1 – Increasing efficiency and resilience Policy SCC2 – Energy Infrastructure Policy SCC3 – Managing Heat Risk Policy SCC4 – Flood Risk Policy SCC5 - Sustainable drainage and surface water management Policy SCC6 – Renewable and Low Carbon Energy and BREEAM Standards Policy SNE1 – Nature Conservation Policy SNE2 – Protection and Enhancement of Wildlife Habitats

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
			Policy SNE3 – Provision, retention and protection of trees, woodlands and hedgerows
How should we address the climate crisis in the Local Plan Review – what should be our priority or priorities?	<ul style="list-style-type: none"> • Sustainable transport, including promoting low-carbon and alternative means • Protect existing open spaces • Avoid planting more trees but conserve those already present • Planting more trees • Move to net zero carbon gain and circular economy • Promote climate-change mitigation in house building • Renovate and reuse buildings • Adopt a combined approach including reducing the use of cars for short journeys and delivering growth in sustainable locations • Prioritise development on brownfield sites 	The SLP contains several policies on climate change and the natural environment that seek to alleviate and mitigate the impacts of climate change. Most of the issues raised by respondents have been addressed in draft plan policies.	Policy SCC1 – Increasing efficiency and resilience Policy SCC2 – Energy Infrastructure Policy SCC3 – Managing Heat Risk Policy SCC4 – Flood Risk Policy SCC5 - Sustainable drainage and surface water management Policy SCC6 – Renewable and Low Carbon Energy and BREEAM Standards Policy SNE3 – Provision, retention and protection of trees, woodlands and hedgerows Policy SHW4– Open Space and Recreation
How else can new development reduce greenhouse gas emissions and respond to the climate crisis?	<ul style="list-style-type: none"> • By promoting the use of, and access to sustainable modes of transport, and by considering the creation of (cross-boundary) wildlife corridors / nature recovery networks. • Where large areas are needed for vehicle parking, provide 'car shelters' that provide both shade and solar panels. 	The SLP contains policies promoting low-carbon alternatives to the private car and the need to maintain and protect green infrastructure and open spaces to allow for the movement of wildlife and nature recovery.	Policy STR5 – Creating Coherent Networks for Cycling and Walking Policy STR6 – Influencing the Demand for Travel and Travel Choices
Should the new plan leave the issue of carbon	<ul style="list-style-type: none"> • The Plan should not repeat the requirements of other legislation. 	Comments noted.	

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
reduction in new buildings to other relevant legislation rather than making its own provision – i.e., should the plan not include policies on carbon reduction but instead wait for emerging Building Regulations	<p>Aligning the Council's requirement for net zero development and carbon reduction with those of Government would therefore be pragmatic and more achievable.</p> <ul style="list-style-type: none"> Should include policies that can be overwritten by national policy / law, if they are more stringent, or local policy retains supremacy if it is better / more comprehensive / more relevant for Sandwell 	The Council will ensure its policies do not repeat other legislation	
How would you feel about building extensions and alterations to your property that were more climate-change adapted and low carbon?	<ul style="list-style-type: none"> welcome guidance roofing on existing industrial and warehousing premises are an untapped source of solar power. Heat pumps will only be viable if homes are fairly new with adequate insulation for them to work efficiently 	Comments noted.	-
What potential sources of renewable energy should the Council be looking at supporting in its local plan policies	inclusion of renewable energy sources within new development will need evidence. Viability of including renewable energy sources within new development will need to be demonstrated.	<p>The draft Plan is based in part on the BCP evidence base and additional evidence has been / will be sought as necessary to ensure its soundness.</p> <p>The Plan policies will be assessed through an independent viability assessment and any issues relating to viability will be identified and addressed as necessary following that work.</p>	Policy SCC6 – Renewable and Low Carbon Energy and BREEAM Standards
4) Questions - Heat Networks	No support for any policy that would require new development to connect to existing district heating or cooling networks or provide new networks – not necessary to	Until overriding legislation and / or zoning plans are in place, SMBC will continue to promote the use of heat networks through the draft local plan. The latest available government guidance (June 2023) identifies	Policy SCC2 – Energy Infrastructure

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	<p>make more connections to the heat network.</p> <p>The Councils should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies.</p>	<p>links between heat network zoning and the planning system but does not elaborate on whether local authorities can also address issues around heat networks through planning policies.</p>	
<p>Do you agree that Sandwell Council should support the development and delivery of heat networks as part of its own building proposals, to help deliver Net Zero construction?</p>	<p>Yes - recognising that district heating systems can transcend borough boundaries and so potentially require policy alignment with neighbouring local authorities.</p>	<p>Comments noted.</p>	<p>-</p>
<p>Do you think the Council should require private sector and other developers to make provision for heat networks, particularly on larger sites?</p>	<ul style="list-style-type: none"> • Yes • No – issues with lack of evidence, effectiveness and viability, disbenefits to users who are locked in and no sector specific protections for users 	<p>Comments noted.</p> <p>Until overriding legislation and / or zoning plans are in place, SMBC will continue to promote the use of heat networks through the draft local plan and policy.</p> <p>The emerging national legislation will establish consumer protections.</p>	<p>Policy SCC2 – Energy Infrastructure</p>
<p>5) Questions - Resilient Landscapes</p>	<p>When looking at areas suitable for renewable energy generation, recommend that the historic environment is considered at an early stage to ensure that areas where there would be harm to the significance of heritage assets are not included, and reasonable alternatives are considered.</p>	<p>Comments noted.</p>	<p>Policy SCC1- Increasing efficiency and resilience</p>
<p>How should we ensure new development is able</p>	<p>Regard to be given to draft BCP Policy CC1</p>	<p>The draft BCP policies on climate change have been used as the basis for the SLP</p>	<p>-</p>

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
to withstand climate change and provide a comfortable living and working environment for people?		policies and due regard has been given to them.	
What should be our priorities when considering new design and landscaping to help us cope with climate change?	<ul style="list-style-type: none"> • Regard to be given to draft BCP Policy CC1 • Retain tree coverage on existing green sites wherever possible when developing. new and mature trees are better than saplings • Design should reuse and adapt existing buildings, incorporating existing open space rather than creating it anew, and avoid unnecessary construction work and unnecessary hard or soft landscaping 	<p>The draft BCP policies on climate change have been used as the basis for the SLP policies and due regard has been given to them.</p> <p>The reuse of buildings is also promoted throughout the draft plan. the Council is seeking to retain and enhance existing open space and will also be looking for opportunities to deliver additional spaces where possible, as part of its objectives to create a greener and healthier environment for residents and ecology.</p> <p>The retention and protection of trees is required in several policies in the draft SLP.</p>	Policy SNE3 - Provision, retention and protection of trees, woodlands and hedgerows
Apart from not building on or near them, how should we protect the open spaces, parks, countryside and ecology of Sandwell?	Not building on them or around them is key. Car parks should be reduced in size and no new car parks built to serve existing sites. Wildlife corridors would help to protect existing nature reserves.	The draft SLP seeks to retain and enhance open spaces across the borough and there are several policies that address the need to deliver a strong network of linked green corridors and open spaces for environmental and health reasons.	Policy SNE2 – Protection and Enhancement of Wildlife Habitats Policy SHW4 – Open Space and Recreation
Apart from not building on or near them, how should we protect the open spaces, parks, countryside and ecology of Sandwell?	<ul style="list-style-type: none"> • Increase users' awareness of their importance for ecology, and for the heritage assets they contain. Discourage damaging activities like off-road cycling. • Celebrate them and designate more Nature Reserves or Geoparks. Sandwell is a deprived, urban area - open 	The draft SLP seeks to retain and enhance open spaces across the borough and there are several policies that address the need to deliver a strong network of linked green corridors and open spaces for environmental and health reasons.	Policy SNE1 – Nature Conservation Policy SNE2 – Protection and Enhancement of Wildlife Habitats Policy SNE3 – Provision, retention and protection of trees, woodlands and hedgerows

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	<p>spaces should be cared for and nurtured by the local community via friends' groups. SINC / SLINC status areas as proposed by the Wildlife Trusts should not be ignored.</p> <ul style="list-style-type: none"> • Ensure that at the least developments do not inhibit the movement of wildlife in and out of these areas, and preferably facilitate movements by extending wildlife corridors. 	<p>The importance of parks, open spaces and countryside is recognised throughout the draft SLP. Opportunities for active leisure such as off-road cycling are being considered outside the remit of the draft SLP but can be included when details are known if necessary.</p> <p>SINC and SLINC designations are taken into account when sites are considered for allocation for development. Any site subject to a SINC designation is ruled out of consideration, as this is treated as a hard constraint. Sites containing SLINCs will also be ruled out unless mitigation for the loss of, or impact on, the area of environmental sensitivity can be achieved to a suitable standard. In those circumstances, some development may be allowed, or a site allocated.</p>	<p>Policy SNE4 - Geodiversity and the Black Country UNESCO Global Geopark</p> <p>Policy SHW4- Open Space and Recreation</p>
6) Questions – Sustainable Drainage	Consider the impacts for the historic environment, for example impacts to waterlogged or buried archaeology as a result of changes to the watercourse.	Comments noted.	-
How should the Local Plan Review best manage flood risk whilst still achieving the growth that is needed to make Sandwell successful?	<ul style="list-style-type: none"> • regard should be had to strategic, especially cross-boundary, flood risk issues and joint working with neighbouring authorities to tackle those issues. • Policies should be included that accord with the requirements of the NPPF. New development should ensure that flood risk is not increased elsewhere outside 	<p>The draft SLP is subject to ongoing duty to co-operate discussions with neighbouring authorities and stakeholders and opportunities to deliver cross-boundary solutions will be explored for a number of topics, including drainage and water issues.</p> <p>All draft SLP policies have been drawn up in accordance with the requirements of</p>	<p>Policy SCC4 – Flood Risk</p> <p>Policy SCC5 - Sustainable drainage and surface water management</p>

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	<p>the site. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.</p>	<p>national planning guidance including the NPPF.</p> <p>Sustainable drainage systems are an important way of tackling flooding in a sustainable way and provide a multifunctional solution to climate change-related flooding and water management and as such will remain a significant part of the Council's climate change adaptation and mitigation proposals.</p>	
<p>Do you think the SLP needs a policy to identify an acceptable rate of run-off for new developments, or is this covered in sufficient detail in the Black Country Local Standards for SuDS (BCP evidence base)?</p>	<p>Sufficient detail should be available within the BCP evidence base, especially to address strategic flood risk issues.</p>	<p>Comments noted.</p>	<p>Policy SCC4 – Flood Risk</p> <p>Policy SCC5 - Sustainable drainage and surface water management</p>
<p>Do you think the SLP: - should include details of the type of SuDS that the Council would prefer to see delivered; should require SuDS schemes but leave details to developers to propose; should not require SuDS but allow for alternative drainage schemes to be implemented?</p>	<ul style="list-style-type: none"> • SUDS are not welcome as they are an attempt to stop nature doing what it does, and water will always exceed expectations • Alternative drainage systems, where water has a semi nature channel to follow, are preferred • The SLP policy should not be overly prescriptive and should enable developers to determine the best SuDS solution for individual sites, which address local conditions. 	<p>Sustainable drainage systems are an important way of tackling flooding in a sustainable way and provide a multifunctional solution to climate change-related flooding and water management and as such will remain a significant part of the Council's climate change adaptation and mitigation proposals.</p> <p>Developers will be able to propose their own SuDS schemes; provided these schemes meet the requirements related to rates of</p>	<p>Policy SCC4 – Flood Risk</p> <p>Policy SCC5 - Sustainable drainage and surface water management</p>

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
		run-off and off-site flooding mitigation, the Council is likely to accept them.	
12. Enhancing the Natural and Built Environment	<p>Number of detailed points from Natural England, relating to:</p> <ul style="list-style-type: none"> • Plan's vision and emerging development strategy • protection of designated biodiversity and geological sites. • SA / HRA screening • need up to date environmental evidence. • protection for irreplaceable habitats, such as ancient woodland, ancient and veteran trees • policies for green infrastructure • protection and enhancement of public rights of way and National Trails. • quantity and quality of green space to meet identified local needs. • additional nitrogen emissions related to traffic generation. • areas of tranquillity • strategic impacts on water quality and flood risk management • positively contribute to reducing flood risk by working with natural processes and using green infrastructure and SUDs 	<p>Comments noted.</p> <p>Many of the points raised by NE have already been addressed in the draft version of the SLP and its policies.</p>	<p>Policy SDS1 – Development Strategy</p> <p>Policy SDS7 - Green and Blue Infrastructure in Sandwell</p> <p>Policy SNE1 – Nature Conservation</p> <p>Policy SNE2 – Protection and Enhancement of Wildlife Habitats</p> <p>Policy SNE3 – Provision, retention and protection of trees, woodlands and hedgerows</p> <p>Policy SNE4 - Geodiversity and the Black Country UNESCO Global Geopark</p> <p>Policy SCC4 – Flood Risk</p> <p>Policy SCC5 - Sustainable drainage and surface water management</p> <p>Policy SHW4– Open Space and Recreation</p>
12. Enhancing the Natural and Built Environment	Stakeholder and interested parties comments related to: -	Comments noted.	

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	<ul style="list-style-type: none"> • protect and promote canal network and their role in providing open spaces for recreation and leisure. • delivery of biodiversity net gains - policy requirement above 10% will need to consider development viability. • minimise the negative environmental impacts of highways networks and enhance the environment. • right tree in the right place and ensuring majority of new tree species used are native and grown in the UK / Ireland. • protection of irreplaceable habitats, including ancient woods and veteran trees, using buffers • record veteran trees on the Ancient Tree Inventory • Require 20% BNG. • Maintain BNG habitats for a minimum of 50 years. • LNRS provide a 'spatial' element to site allocation decisions and general enhancement and ecology • standards for high-quality green infrastructure for development – re: proximity to trees, visual amenity, access to woodland. 	<p>Many of the points raised by stakeholders have already been addressed in the draft version of the SLP and its policies.</p> <p>Given the marginal viability of much of the land and proposed sites in Sandwell, the Council is unlikely to seek a minimum BNG target of more than 10%, although schemes that can provide over this figure will be welcomed.</p>	
46) Questions – Biodiversity Net Gain	<ul style="list-style-type: none"> • Should not require more than 10% BNG - significant additional costs associated with biodiversity gain, which should be fully accounted for in viability work. 	<p>Given the marginal viability of much of the land and proposed sites in Sandwell, the Council is unlikely to seek a minimum BNG target of more than 10%, although schemes</p>	<p>Policy SNE1 – Nature Conservation Policy SNE2 – Protection and Enhancement of Wildlife Habitats</p>

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	<ul style="list-style-type: none"> Should set out a strategic approach, plan positively for creation, protection, enhancement and management of biodiversity networks. Should consider geodiversity conservation re: geological sites and features. 	<p>that can provide over this figure will be welcomed.</p> <p>The Plan policies will be considered in an independent viability assessment and any issues relating to viability will be identified and addressed as necessary following that work.</p>	
<p>Do you think the SLP should contain a policy on retaining offsite biodiversity net gain in Sandwell?</p>	<ul style="list-style-type: none"> Strong disagreement with BNG – allows developers to build without replacing what was there potential for mutual consideration of Biodiversity Net Gain schemes outside of individual local authority boundaries including wider landscape-scale schemes In order for a proposed policy on retaining offsite biodiversity net gain in Sandwell to be feasible, the council will need to identify locations that can be used for any off-site contributions. It is important that BNG does not prevent, delay or reduce housing delivery. 	<p>Comments noted.</p> <p>Council has commissioned work on identifying potential BNG habitat bank sites on its own land to enable it to provide units within the borough if required.</p>	<p>Policy SNE2 – Protection and Enhancement of Wildlife Habitats</p>
<p>If so, how do you think the Council should achieve this?</p>	<ul style="list-style-type: none"> Strong disagreement with BNG - an incentive for land banking fraud via a combination of private and public approaches. 	<p>Comments noted</p>	<p>-</p>
<p>Do you think we should explore a requirement for additional biodiversity net gain credits (e.g. more than 10% minimum) should</p>	<p>Requiring BNG above 10% does not meet the tests set out in paragraph 57 of the NPPF and in particular, a greater than 10% requirement is not necessary to make the development acceptable in planning terms.</p>	<p>Given the marginal viability of much of the land and proposed sites in Sandwell, the Council is unlikely to seek a minimum BNG target of more than 10%, although schemes that can provide over this figure will be welcomed.</p>	<p>Policy SNE2 – Protection and Enhancement of Wildlife Habitats</p>

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
<p>developers be proposing to purchase them for schemes outside Sandwell?</p>			
<p>Do you agree with this proposal? (Green space hierarchy)</p>	<ul style="list-style-type: none"> • No - do not trust this process and believe the intention is to sell off green space. Should not have a hierarchy whereby spaces deemed poor or surplus are sold off. • Expect hierarchy review will recognise the role of the existing network of green spaces in meeting residents' needs, with an emphasis on protecting and enhancing multi-functional natural assets. 	<p>Comments noted.</p>	<p>-</p>
<p>The Rowley Hills</p> <ul style="list-style-type: none"> - is current level of protection sufficient? - does protection need to be increased? - scope for any residential or economic development? 	<p>The ridge merits the highest degree of protection. It is the most prominent physical feature in Sandwell, visible from most parts of the Borough and a recognizable landmark for those travelling through on major routes. The recent Geopark designation is an additional reason for protection.</p>	<p>Comments noted.</p> <p>The Council has commissioned work on the future protection of the Rowley Hills, which will be used to produce a policy for the SLP setting out guidance and protection for them</p>	<p>Policy SNE5 - The Rowley Hills</p>
<p>Do you think the Rowley Hills should be allocated as Local Green Space in the SLP?</p>	<ul style="list-style-type: none"> • Not ahead of other sites such as those bordering Sheepwash, which have equal "richness of wildlife" and which could be improved with careful consideration and protection from development. • The hills provide valuable open for residents but their wider importance 	<p>Comments noted.</p> <p>The Council has commissioned work on the future protection of the Rowley Hills, which will be used to produce a policy for the SLP setting out guidance and protection for them</p>	<p>Policy SNE5 - The Rowley Hills</p>

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	<p>merits greater protection than that given to Local Green Spaces.</p>		
<p>Do you think the Rowley Hills should be designated as green belt?</p>	<ul style="list-style-type: none"> • No, as this would imply that any other areas in Rowley/Tipton and Oldbury are less protected and would be built on. • Green Belt would give the highest degree of protection but not sure whether the Hills would meet the required criteria. 	<p>Comments noted.</p> <p>The Council has commissioned work on the future protection of the Rowley Hills, which will be used to produce a policy for the SLP setting out guidance and protection for them.</p>	<p>Policy SNE5 - The Rowley Hills</p>
<p>Do we need to prepare a policy to support the adoption of a Sandwell Local List of buildings of historic / architectural merit?</p>	<ul style="list-style-type: none"> • Yes - more needs to be done to protect heritage. Include brutalist buildings. Consider embedded carbon in safeguarding buildings from demolition. • A policy to support the adoption of local buildings of historic and architectural merit should be considered to support this local list project work. • Regard to be given to draft BCP Policy ENV5. 	<p>Comments noted.</p> <p>A draft policy on locally important historic buildings has been produced.</p>	<p>Policy SHE3 – Locally Listed Buildings</p>
<p>Do we need to prepare a new policy to address the safeguarding of heritage assets when mitigating against and adapting to the climate change emergency?</p>	<p>Yes- and this also needs to state how retention and sensitive adaptation of heritage assets contribute to mitigation and adaptation to climate change</p>	<p>Heritage assets and their contribution to the character of local areas have been addressed in the draft SLP. There are several policies relating to the historic environment that will support the reuse and adaptation of heritage assets.</p>	<p>Policy SCC1- Increasing efficiency and resilience (part j)</p>
<p>Do we need to consider the introduction of special controls that prevent the demolition of non-designated,</p>	<ul style="list-style-type: none"> • Yes • Regard to be given to draft BCP Policy ENV5. • Agree, if there are current issues with retaining non-designated locally important heritage assets. It could 	<p>Comments noted.</p>	<p>Policy SHE3 – Locally Listed Buildings</p>

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
locally important heritage assets	include a preference for the retention and re-use of non-designated heritage assets or locally important heritage assets, as opposed to demolition.		
Some of the conservation areas in Sandwell are in centres where there is or has been a lot of pressure for development and growth. As a result, any previous appraisals (undertaken when they were first designated) are likely to be out of date	<p>The area of Great Barr Hall Registered Park and Garden in Sandwell is a conservation area. Local planning authorities have a duty to review</p> <p>Review all conservation areas and undertake character appraisals where appropriate.</p>	<p>Comments noted.</p> <p>Should the Council undertake reviews of conservation areas, this section will be considered in due course.</p>	Policy SHE1 – Listed Buildings and Conservation Areas
<p>Do you think the Council should also be exploring:</p> <ul style="list-style-type: none"> - whether there are any new conservation areas that could be designated; or whether any current conservation areas no longer carry sufficient interest and importance to be retained as a conservation area 	<p>Yes - The site of Brandhall Golf course contains remains of the medieval chapel of St Katherines and as according to Historic England the site also contains a very rare feature in Sandwell - The Brandhall Ridge and Furrow - medieval farming feature</p> <p>These features need to be taken in to account as well as the biodiversity the site contains - Crested Newts, Live Badger Setts</p> <p>Rare protected Fauna and flora including fungi, birds and orchids</p>	Comments noted.	Policy SHE1 – Listed Buildings and Conservation Areas
Do you agree with the proposal to update the existing SAD policy on archaeology?	yes	Comment noted.	Policy SHE4 - Archaeology

Heading / Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
Do you agree with the proposal to include a policy on the Black Country Global Geopark?	Yes - supports this proposal. Regard should be had to draft BCP Policy ENV6.	Comments noted	Policy SNE4 - Geodiversity and the Black Country UNESCO Global Geopark
Are you aware of any features of geological interest in your area that you want to bring to our attention?	The site of Brandhall Golf course contains a geological SLINC A 300 M YEAR OLD ROCK OUTCROP. Avery re\are exposure of a Enville formation conglomerate	Comments noted	-

Chapter: <i>Housing</i>			
Main heading or question number	Support*	Object*	Comment*
3) Development Strategy and Housing Provision	1	2	6
7) <i>Future Development in Sandwell</i>	0	3	4
What do you think are the main challenges we face in planning for housing and employment in Sandwell between now and 2041?	0	0	8
What are your views on the overall amount of new housing and employment that is needed in Sandwell?	0	0	7
What types of homes are needed in Sandwell?	0	0	6
Where do you think this new housing should be built?	1	1	10
What sort of new development (homes, workplaces, shops, leisure facilities etc) do you think would help make Sandwell a better place to live by 2041?	0	0	6
Where do you think it should be built?	0	0	0
Do you think there are any sorts of development that would make Sandwell a worse place to live by 2041?	0	0	3
What harm do you think that sort of development might do to Sandwell?			
Do you think we should be asking for higher density developments in centres and on sites near public transport hubs / links? • If so, do you think we should use the densities identified in the draft BCP (Policy HOU2) and set out above?	0	1	7

<ul style="list-style-type: none"> • Should we ask for higher densities than this? • Should we ask for lower densities than this? 			
What do you think a sustainable urban land use and an unsustainable urban land use would be, from a transport point of view?	0	0	2
Tell us about some modern developments or buildings that you know and like. Why do you like them?	0	0	2
Tell us about some modern developments or buildings that you know and don't like. Why don't you like them? How might they have been done better?	0	0	1
Which of the following issues are most important to you (they are not listed in any order)? Please identify your priorities in order if you can, as this will help us address what is most important to Sandwell's residents and occupiers.	0	0	6
Should there be a greater emphasis on: - <ul style="list-style-type: none"> • allocating land for mixed-use development (where housing, employment / business development, community facilities etc. sit next to each other); • allocating land for single end uses, such as just housing or just employment? 	0	0	9
Do you have any other comments to make about what development options for housing, employment or other land uses you think we should consider as we draft the Sandwell Local Plan?	0	2	3
8) Housing Windfall Sites			
We think that a local windfall policy is needed to ensure that any proposals for residential development on sites that are not allocated are in the right place and do not have adverse impacts on current and neighbouring uses. <ul style="list-style-type: none"> • Do you agree? • If so, what should it contain? 	2	1	4
Are there any specific local considerations that we should include when we are making decisions on windfall sites? For example: <ul style="list-style-type: none"> • should development be allowed on current employment land? 	0	1	2
9) Sustainable Locations	0	0	4
Should most new development: be concentrated in locations with the best levels of sustainable access to jobs, transport, services and facilities? be spread out between different towns and centres, to help support new growth and investment	1	0	9
Are there any locations in Sandwell you think we should look at in particular to find land for new development?	0	0	6
What else can the SLP do to support the sustainability of local communities?	0	0	2
Other Housing Issues	0	0	1
13) Self and Custom Build Housing	0	0	1

Do you think Sandwell's new local plan should include a policy on self- and custom-build?	0	1	1
If you do, how do you think the Council should deal with issues around self-build proposals on commercial housing sites?	0	0	0
Do you think self-build should be supported in another way in Sandwell (e.g. not provided on commercial housing development sites; subject to a different policy approach)?	0	0	1
14) Specific Housing Requirements	0	0	2
Do you agree that the new SLP should contain a policy on housing suitable to meet the needs of people who have special needs or who require additional support?	0	0	4
What types of housing suitable to meet special needs do you think should be encouraged and delivered in Sandwell?	0	0	1
The Council intends to incorporate the national minimum space standards for new housing as set out in the optional Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings21. • Do you agree with this approach?	0	0	3
15) Gypsies, Travellers and Travelling Showpeople	0	0	1
Do you agree with the proposal to adapt the draft BCP policy on the needs of travelling communities for use in Sandwell?	1	0	3
16) Houses in Multiple Occupation	0	0	1
We think that the Sandwell Plan could have a policy on HMOs that seeks to define areas where HMOs would be inappropriate / discouraged, e.g. where there are already a number of existing HMOs. • Do you agree and if so what criteria do you think should be used to evidence why they are inappropriate? • If you do not think a policy would be appropriate, can you explain why you think that? • Are there any alternative options we might look to use instead of or alongside a planning policy for HMOs?	2	0	0
We think that the policy could look to identify aspects of HMO provision that have the potential to adversely affect the amenities of adjoining or neighbouring properties (e.g. noise, overlooking, general disturbance, or impact on visual amenity) and provide criteria to manage those issues; Do you agree and if so, what sort of realistic criteria should we be looking to include?	1	0	0
We think that the policy could introduce percentage thresholds and clustering criteria to ensure that HMOs are not concentrated in an area above a certain level and to control their numbers across a wider area; Do you agree and if so what evidence is needed to identify and justify these criteria?	1	0	1
To enable us to further control changes of use to small HMOs, the Council will need to impose an Article 4 direction, which, once adopted, will make such changes of use subject to the planning application process. Do you agree with this approach? Do you disagree? If so, can you explain why?	1	0	0

Do you think the Council should: <ul style="list-style-type: none"> introduce a Sandwell-wide Article 4 Direction for HMOs (requires every proposal to develop an HMO to be subject to planning permission and will involve additional time and resources to manage)? do you think an Article 4 Direction should be imposed only on those parts of Sandwell where there are already a large number of HMOs and where there is evidence of the sorts of issues mentioned previously? 	1	0	1
	12	12	128
42) Communications and Digital Infrastructure - Do you agree with this approach?	0	0	1
43) Telephone Kiosks - Do you agree with this approach?	0	0	0
44) Broadband - Do you agree with this approach?	0	0	0
TOTAL	0	0	1

Include a summary of the main issues, a summary of the Councils' response and any proposed change in the table below.

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
Development Strategy and Housing Provision	Note that the Council will not be able to meet all of its housing needs in the Borough.	The Council will work with the other Black Country LAs to meet the shortfall and Duty to cooperate will continue with adjacent local authorities to identify opportunities	
	Support increase in densities but should look to increase further	The SLP housing allocations provide a variety of densities to meet local needs, and which also respect local character.	
	Object to building on Green Belt and Green Spaces	The UCR Update robustly demonstrates the limits on urban housing land supply in the borough. The SLP housing supply includes a modest proportion of greenfield release supply. This supply is necessary in order to help meet identified local housing needs and will also help to increase housing delivery by contributing towards a mix of types, sizes and locations of housing site to meet varied market demand and local needs.	

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	Surrounding authorities estimated to have a shortfall in housing land supply and all councils should continue to work together through the Greater Birmingham and Black Country HMA to address the shortfalls.	Comment noted	
	The Council should explore all potential sources of housing land supply.	A Call for Sites exercise was undertaken and sites submitted assessed, the Council also undertook an assessment of brownfield and greenfield land to see if suitable / available / deliverable for housing and or employment land.	
	Policies on provision of affordable housing should be flexible and take account of viability.	<i>Noted – The SLP has a policy regarding viability.</i>	
	The plan should identify the necessary support infrastructure needed.	An Infrastructure Delivery Plan has been produced which details if any infrastructure is needed.	
<i>7) Future Development in Sandwell</i>			
What do you think are the main challenges we face in planning for housing and employment in Sandwell between now and 2041?	Identifying sufficient sites to meet the borough's need.	A number of sites submitted through the Call for Sites consultation have been considered through the site assessment process and a small number are proposed for allocation. The site assessment process is fair and robust.	
	A Green Belt review is needed to meet the Council's housing need.	The SLP seeks to strike a balance between maximising the realistic amount of capacity of development whilst delivering the aims set out in the Vision to create a healthy and active borough, maintaining and enhancing the natural and built environment.	
	The LHN is the minimum starting point.	Noted	
	Balancing providing quantity of developments with their quality.	Noted	
	An appropriate balance between housing and employment land is required.	Noted	

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
What are your views on the overall amount of new housing and employment that is needed in Sandwell?	The Plan should be informed by an understanding of the reasons for population growth in the borough.	Noted	
	Housing supply needs to be increased and previously developed land needs to be assessed to see if suitable for housing.	A Call for Sites exercise was undertaken and sites submitted assessed, the Council also undertook an assessment of brownfield and greenfield land to see if suitable / available / deliverable for housing and or employment land.	
What types of homes are needed in Sandwell?	A range of size and type of homes are needed.	The SLP has policies that require a range of types and sizes of homes.	
	Affordable housing.	The SLP has a policy requiring affordable housing as part of developments.	
Where do you think this new housing should be built?	Should not build in the Green Belt.	There are no sites proposed in the Green Belt.	
	Brownfield land only; Green Belt and green field land as well as brownfield land	The UCR Update robustly demonstrates the limits on urban housing land supply in the borough. The SLP housing supply includes a modest proportion of greenfield release supply. This supply is necessary in order to help meet identified local housing needs and will also help to increase housing delivery by contributing towards a mix of types, sizes and locations of housing site to meet varied market demand and local needs.	
What sort of new development (homes, workplaces, shops, leisure facilities etc) do you think would help make Sandwell a better place to live by 2041?	Sustainable locations	All of the sites proposed have been assessed through the sustainability appraisal process.	

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	Mixed use developments	The SLP allocates several sites for mixed use development.	
Where do you think it should be built?	Several sites put forward	All sites have been through the site assessment process.	
Do you think there are any sorts of development that would make Sandwell a worse place to live by 2041?	Out of town shopping centres. Poorly designed or located development Polluting industry Scrap yards and waste tips.	There are no out of town shopping centres proposed. The SLP has policies on design to ensure developments are well designed. The SLP allocates sites for employment use and directs scrap yards etc to these sites.	
What harm do you think that sort of development might do to Sandwell?			
Do you think we should be asking for higher density developments in centres and on sites near public transport hubs / links? • If so, do you think we should use the densities identified in the draft BCP (Policy HOU2) and set out above? • Should we ask for higher densities than this? • Should we ask for lower densities than this?	No; Query whether the higher densities are deliverable; Yes Support along strategic bus routes Should be considered on a site by site basis Suitable for higher density developments not just in town centres but also other sustainable locations.	Access to residential services by sustainable transport should be the key determinant of housing density, in line with national guidance. Site constraints have been taken into account, as far as possible, when estimating the capacity of individual housing allocation sites in the SLP. Where these constraints become apparent at planning application stage, these will be taken into account.	
What do you think a sustainable urban land use and an unsustainable urban land use would be, from a transport point of view?	Developments that are not within 15 minutes of local facilities	Noted All sites proposed were assessed which included their accessibility.	
Tell us about some modern developments or	Crocketts Lane – retained the old buildings	Noted	

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
buildings that you know and like. Why do you like them?	Apartment block on the corner of Bearwood road / Waterloo Road Parish Lane housing development on corner of Lower Church Lane and Alexandra Rd. Flats on corner of Bull St and Overend St West Bromwich.		
Tell us about some modern developments or buildings that you know and don't like. Why don't you like them? How might they have been done better?	'Fisher Bridge' housing being built at Lower City Road, Oldbury. Nothing wrong particularly if built in a different place. Houses fronting Lower City Road are too large when approaching along Dudley Rd. The layout totally ignores the canal side setting, while there is a view from the tow path into one house. Flats with balconies would be better, or ideally a pub or restaurant	Noted	
Which of the following issues are most important to you (they are not listed in any order)? Please identify your priorities in order if you can, as this will help us address what is most important to Sandwell's residents and occupiers.	1 Protecting and improving existing green spaces and wildlife habitats. 2 Creating new green spaces and nature networks 3 Building affordable housing 4 Developing a well-designed and attractive built environment, with new buildings and areas that make a positive contribution to their surroundings.	Policies are included in the SLP that seek to protect and improve existing green space and also create new green spaces where appropriate. Policy SHO4 Seeks the requirement of affordable housing and Policies SDS4 Set out design requirements which will result in well-designed developments.	
Should there be a greater emphasis on: - • allocating land for mixed-use development (where housing, employment / business development, community facilities etc. sit next to each other);	No – introduces more housing by stealth No - Policy on mixed uses should be carefully worded to prevent 'anything goes', and be sensitive to differences in local community needs, values and preferences. Yes it makes effective use of the land Yes - encourages 15 min neighbourhoods, less travel, less sprawl and inefficient use of space.	The SLP allocates sites for mixed use development, these are set out in Appendix B and detail the type and quantity of uses.	

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
<ul style="list-style-type: none"> allocating land for single end uses, such as just housing or just employment? 	<p>The appropriateness on any given site should be assessed on a site-by-site basis.</p> <p>Yes – allows flexibility</p>		
<p>Do you have any other comments to make about what development options for housing, employment or other land uses you think we should consider as we draft the Sandwell Local Plan?</p>	<p>Existing houses, both council owned and private that have been unoccupied for many years should be compulsorily purchased and brought back into use.</p> <p>The need for older people's housing must be incorporated into the emerging plan.</p>	<p>The Council has a pipeline of regeneration projects and has been successful in bidding for funding to aid the development of these projects.</p> <p>Policy SHO11 Sets out approach to older people's housing.</p>	
8) Housing Windfall Sites			
<p>We think that a local windfall policy is needed to ensure that any proposals for residential development on sites that are not allocated are in the right place and do not have adverse impacts on current and neighbouring uses.</p> <ul style="list-style-type: none"> Do you agree? If so, what should it contain? 	<p>The Council should demonstrate that it can meet the requirement of NPPF para 69 – identify through the development plan and brownfield registers, land to accommodate at least 10% of housing requirement to be met on sites no larger than one hectare.</p> <p>Windfall allowances should not be included until the fourth year of a housing trajectory.</p> <p>Windfall sites should be subject to CIL / S.106 agreements.</p> <p>There are 'bad neighbour uses' which could affect windfall sites.</p> <p>Proposals shouldn't prejudice the possibility of more comprehensive developments or the creation of pedestrian or cycle routes.</p>	<p>The SLP and latest brownfield register show that the requirement has been met.</p> <p>Windfall allowances have not been included in the 5 year supply.</p> <p>Noted</p> <p>Policy SEC6 and the Agents of Change principles will ensure that neighbouring uses are taken into account.</p> <p>Policies in the SLP seek comprehensive developments and also linking to pedestrian and cycle routes</p>	

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	Inclusion of windfall site policy acknowledging that provision will be part of the land supply is both appropriate and normal	Noted	
<p>Are there any specific local considerations that we should include when we are making decisions on windfall sites? For example:</p> <ul style="list-style-type: none"> • should development be allowed on current employment land? 	<p>Where it will improve the environment of nearby housing by removing badly maintained or unsightly buildings and remove nuisance caused by traffic movements, parking, noise, pollution etc. Also where it will improve access for pedestrians and cyclists, and reduce carbon emissions.</p> <p>Specific consideration will be the housing, employment and other needs locally at the time of a windfall site coming forward.</p>	The SLP includes a Windfall policy that permits development where certain criteria are met and will therefore provide additional housing in suitable locations.	
9) Sustainable Locations	<p>The Plan should promote development at locations that are or can be made sustainable.</p> <p>Should maximise walking, wheeling, cycling and public transport.</p> <p>Individual and cumulative impact of any large developments in close proximity to the SRN to be considered through the development of transport evidence base.</p> <p>Ensure there is connectivity at transport hubs.</p> <p>Take into account the historic environment.</p> <p>Development should be prioritised around sustainable transport growth nodes.</p>	Site proposals were assessed which took into account their location, its accessibility, impact on surrounding uses, and densities were applied based on their accessibility and local character. An IDP has been produced which looks at what infrastructure is needed.	

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	<p>Should use development contributions to deliver infrastructure</p> <p>Focus on deprived areas.</p>		
Are there any locations in Sandwell you think we should look at in particular to find land for new development?	Several sites proposed.	A Call for Sites exercise was undertaken and sites submitted assessed, the Council also undertook an assessment of brownfield and greenfield land to see if suitable / available / deliverable for housing and or employment land.	
What else can the SLP do to support the sustainability of local communities?	<p>Bring unused housing and retail space back in use for those specific purposes;</p> <p>Connectivity through good transport infrastructure is critically important to ensure that existing and new residential areas have ready access to jobs and social infrastructure. Sandwell should also look to plan for walkable neighbourhoods where there is a juxtaposition of homes, jobs, community services and leisure opportunities.</p>	<p>Sites were identified from the Strategic Housing Land Availability Assessment, Call for Sites, desk top survey and were assessed to see if they were suitable for housing or employment use, this included vacant sites and sites with derelict buildings.</p> <p>The site assessment took into account the sites accessibility to employment, health, schools and food.</p>	
13) Self and Custom Build Housing			
Do you think Sandwell's new local plan should include a policy on self- and custom-build?	<p>Support proposals for self build and custom build housing in sustainable locations</p> <p>Do not consider that requiring major developments to provide for self-builders is appropriate.</p> <p>Should be assessed on site by site basis.</p> <p>Policy should include wording that any serviced plots not taken up (for example after 12 months marketing) can revert to open market housing.</p>	SHO56 only requires supply of self-build plots where there is an unmet need from self-build registers. The Policy also allows for plots to be advertised for a reasonable period and if there is no demand they can revert to standard housing.	

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	<p>Due to the low demand for these types of plots, query whether a policy is needed.</p> <p>Entering into numerous contracts could slow housing delivery on major sites.</p> <p>There are potential health and safety issues in have individual construction sites operating within a strategic development project.</p>		
If you do, how do you think the Council should deal with issues around self-build proposals on commercial housing sites?			
Do you think self-build should be supported in another way in Sandwell (e.g. not provided on commercial housing development sites; subject to a different policy approach)?			
14) Specific Housing Requirements			
Do you agree that the new SLP should contain a policy on housing suitable to meet the needs of people who have special needs or who require additional support?	<p>Support measures to increase the supply of specialist older people's housing.</p> <p>The provision of appropriate enhanced visitor moorings would constitute a specific housing requirement</p>	The SLP includes policies on residential canal moorings and specialist housing needs.	

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	It should also address the environment surrounding any new development and the ease of accessing relevant support services.		
What types of housing suitable to meet special needs do you think should be encouraged and delivered in Sandwell?			
<p>The Council intends to incorporate the national minimum space standards for new housing as set out in the optional Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings²¹.</p> <ul style="list-style-type: none"> • Do you agree with this approach? 	<p>The requirements to meet Part M4(2) will be superseded by changes to residential Building Regulations. The Government response to 'Raising accessibility standards for new homes' states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course. The requirement to address this issue is planning policy is therefore unnecessary.</p> <p>There is also a need to differentiate between Part a) and part b) of M4(3) technical standards. M43a sets out standards for wheelchair adaptable housing, where M43b relates to wheelchair accessible housing which can only be required on affordable housing where the Council has nomination rights.</p> <p>Need to build more homes for the disabled as per the Equality Act 2010</p>	<p>The Government has consulted on building regulations but not in place to date. Will amend text once regulations are in place.</p> <p>Policy SH05 is clear on M4(3) and what is required.</p>	

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	<p>A development plan should be clear regarding what is required in terms of provision of accessible homes, in terms of both the proportion of homes and the standards to be achieved. There is need for development plan policies to be cognisant of building regulations requirements, without necessarily repeating the detail of what new homes will be expected to comply with.</p> <p>Ensuring that residents have the ability to stay in their homes for longer through providing more accessible/adaptable housing, is not, an appropriate way to meet the housing needs of older people. Adaptable houses do not provide on-site support, care and companionship of specialist older persons' housing developments nor do they provide wider community benefits such as releasing under occupied family housing and savings to the public purse by reducing the stress on health and social care budgets.</p>		
15) Gypsies, Travellers and Travelling Showpeople			
Do you agree with the proposal to adapt the draft BCP policy on the needs of travelling communities for use in Sandwell?	It is requested that the wording is amended to: '5) The location, design and facilities provided on new sites will be determined in consultation with local gypsies and travellers and travelling show people and will also consider / reflect any available national guidance. Proposals for development will be expected to be well designed and laid out respecting Secured by Design principles. It is recommended that pre-	Text incorporated into policy SHO10	

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	application advice is sought from the West Midlands Police Design Out Crime Officers.'		
16) Houses in Multiple Occupation			
<p>We think that the Sandwell Plan could have a policy on HMOs that seeks to define areas where HMOs would be inappropriate / discouraged, e.g. where there are already a number of existing HMOs.</p> <ul style="list-style-type: none"> • Do you agree and if so what criteria do you think should be used to evidence why they are inappropriate? • If you do not think a policy would be appropriate, can you explain why you think that? • Are there any alternative options we might look to use instead of or alongside a planning policy for HMOs? 	<p>Need to address the rise of low quality HMO's;</p> <p>Should implement an Article 4 to require consent for all new HMOs;</p> <p>The CCWMP formally requests that it is an explicit policy requirement for HMO proposals to be designed and implemented in compliance with the Secured by Design standards to ensure future occupants have a safe and secure home where crime, antisocial behaviour and the fear of crime are minimised.</p> <p>Support policy that introduces percentage thresholds and clustering criteria.</p>	<p>New Policy on HMO included in SLP.</p> <p>Text included in policy / justification SHO8</p> <p>Noted</p>	
We think that the policy could look to identify aspects of HMO provision that have the potential			

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
<p>to adversely affect the amenities of adjoining or neighbouring properties (e.g. noise, overlooking, general disturbance, or impact on visual amenity) and provide criteria to manage those issues; Do you agree and if so, what sort of realistic criteria should we be looking to include?</p>			
<p>We think that the policy could introduce percentage thresholds and clustering criteria to ensure that HMOs are not concentrated in an area above a certain level and to control their numbers across a wider area; Do you agree and if so what evidence is needed to identify and justify these criteria?</p>			
<p>To enable us to further control changes of use to small HMOs, the Council will need to impose an Article 4 direction, which, once adopted, will make such changes of use subject to the planning</p>			

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
<p>application process. Do you agree with this approach? Do you disagree? If so, can you explain why?</p>			
<p>Do you think the Council should:</p> <ul style="list-style-type: none"> • introduce a Sandwell-wide Article 4 Direction for HMOs (requires every proposal to develop an HMO to be subject to planning permission and will involve additional time and resources to manage)? • do you think an Article 4 Direction should be imposed only on those parts of Sandwell where there are already a large number of HMOs and where there is evidence of the sorts of issues mentioned previously? 			
Communications and Digital Infrastructure			
42) Communications and Digital Infrastructure - Do you agree with this approach?	Under this proposal, the Sandwell Local Plan could elaborate a little further on the importance of digital infrastructure across the transport sector by considering how the West Midlands is playing a leading role at the heart of the UK Connected and Autonomous Vehicle	Noted	

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	<p>(CAV) ecosystem. The region is a test-bed for CAV and through the arrival of 5G areas, will exceed in future mobility options. Therefore, the importance of CAV, the installation of 5G networks and the region being a global centre for testbeds in new mobility technologies could further be considered in new development.</p> <p>Additionally, digital connectivity is further recognised as one of the key aspects of the triple access system within the LTP, helping to improve accessibility, with the WMCA setting out support for a wider WMCA digital roadmap. This includes enhancing the digital skills across local governments transport sector, improving our digital services which enhances people's accessibility levels, delivering on well-designed digital platforms, data sets and digital access points across the transport system and the roll out of electric charging points. Working collaboratively with TfWM as well as our digital sector partners will be invaluable and should therefore be referenced within the plan.</p>		
43) Telephone Kiosks - Do you agree with this approach?			
44) Broadband - Do you agree with this approach?			

Summary of Main Issues Raised by Issues & Options Consultation and the Councils' Responses

NOTE: the representations have been summarised

Reps placed into chapters and split by policy, site allocation or main heading.

From the reps received, identify for each policy, site allocation or main heading:

- Number of reps objecting to the policy, site allocation or main heading
- Number of reps supporting the policy, site allocation or main heading
- Number of comments received

Economy			
Main heading or question number	Support*	Object*	Comment*
8. Supporting A Sustainable Economy	0	0	5
28) Employment Land Need	0	0	1
How do you think the shortfall in the supply of employment land should be addressed?	0	0	5
30) Regeneration	0	0	
Do you think that the SLP needs a specific policy in relation to the regeneration of parts of Sandwell?	0	0	3
Thinking about areas that need to be improved, what do you think would make Sandwell a more attractive prospect for potential homeowners, inward investment and new business occupiers?	0	0	4
31) Demand for Sites			
Demand for employment sites - Do you think we should focus on supporting the growth of existing smaller businesses and companies on sub-divided former industrial sites?	0	0	1
Do you think the Council should require private sector and other developers to make provision for heat networks, particularly on larger sites?	0	0	1
32) Non-conforming Employment Uses			
Non-conforming Employment Uses - Do you agree that these non-conforming employment uses should be addressed in the SLP?	0	0	3
Non-conforming Employment Uses - If so, do you think the SLP should contain a policy addressing what ancillary uses might be appropriate and in what locations (e.g. where there are no suitable facilities within a short walk or where the ancillary use is not one that needs to be in a town	0	0	3
33) Alternative Uses in Industrial Areas			

Economy			
Main heading or question number	Support*	Object*	Comment*
Do you agree that local employment estates / land / sites should be retained exclusively for local and small-scale employment uses?	0	0	4
Are there any circumstances where you feel non-employment uses would be appropriate in such areas?	0	0	5
If so, what sort of uses do you think would be appropriate?	0	0	4
Where else do you think larger community and commercial activities like the examples given above should be located?	0	0	3
How do we ensure that if such uses are allowed in employment locations, they do not proliferate / draw trade and activity away from town centres?	0	0	4
34) Training and Recruitment			
We intend to update the existing SAD policy on training and recruitment. Do you agree?	0	0	3
TOTAL	0	0	49

Include a summary of the main issues, a summary of the Councils' response and any proposed change in the table below.

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
8. Supporting a Sustainable Economy	In the first instance, needs arising within the Black Country FEMA should be addressed within the FEMA itself. The EDNA update recommends that collectively, the employment land 'need' across the FEMA is some 512ha, and that the corresponding shortfall is some 22.4ha after taking into account current proposed contributions from neighbouring Local Plan areas. The Report recommends that the closing of this gap should be addressed through ongoing Duty to Cooperate activity with a focus on those areas having a strong or moderate functional economic relationship with the Black Country (as defined in the 2017 EDNA), and other areas where there is evidence of a functional relationship.	The Council will work with the other Black Country LAs to meet the shortfall and Duty to cooperate will continue with adjacent local authorities to identify opportunities	No change

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	<p>Transport and the accessibility it provides is essential for our economy and many of issues covered in this chapter are welcomed. But as discussed under other chapters, we note the challenges to providing good access by public transport to some existing employment sites.</p>		
28) Questions – Employment Land Need	<p>The needs arising within the Black Country FEMA should be addressed within the FEMA itself. The EDNA update recommends that collectively, the employment land ‘need’ across the FEMA is some 512ha, and that the corresponding shortfall is some 22.4ha after taking into account current proposed contributions from neighbouring Local Plan areas. The Report recommends that the closing of this gap should be addressed through ongoing Duty to Cooperate activity with a focus on those areas having a strong or moderate functional economic relationship with the Black Country.</p>	<p>The Council will work with the other Black Country Authorities to address the shortfall of employment land.</p>	No change
28) Employment Land Need - How do you think the shortfall in the supply of employment land should be addressed?	<p>The needs arising within the Black Country FEMA should be addressed within the FEMA itself. The EDNA update recommends that collectively, the employment land ‘need’ across the FEMA is some 512ha, and that the corresponding shortfall is some 22.4ha after taking into account current proposed contributions from neighbouring Local Plan areas. The Report recommends that the closing of this gap should be addressed through ongoing Duty to Cooperate activity with a focus on those areas</p>	<p>The Council will work with the other Black Country Authorities to address the shortfall of employment land.</p> <p>The problem has existed for a while in Sandwell in that there has been a lack of available sites which could be considered as strategic employment sites.</p>	No change

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	<p>having a strong or moderate functional economic relationship with the Black Country.</p> <p>New larger strategic sites for employment, which are suited to modern commercial and employment needs and appropriately located to meet sustainability objectives, are likely to be a principal component of future supply.</p>		
<p>30) Questions – Regeneration - Do you think that the SLP needs a specific policy in relation to the regeneration of parts of Sandwell?</p>	<p>There is support for regeneration areas within Sandwell, which should be the focus for employment in the borough and redevelopment opportunities.</p>	<p>The Council will look to focus economic growth in the regeneration areas</p>	<p>The change from one core regeneration area to a number of regeneration areas</p>
<p>30) Questions – Regeneration - Thinking about areas that need to be improved, what do you think would make Sandwell a more attractive prospect for potential homeowners, inward investment and new business occupiers?</p>	<p>The enhancement and expansion of (strategic) green infrastructure.</p> <p>Sandwell suffers from a legacy of the wrong sort of mixed uses. Removing inappropriate bad neighbour developments would improve residents' lives and make the borough more attractive place for businesses and new residents to move to.</p> <p>There is support for the principle of mixed uses, in the interests of delivering sustainable walkable communities and minimising the need for car travel.</p>	<p>The Council has looked at those employment sites which are located in mainly residential areas to see if the sites could be uses for alternative uses such as residential</p>	<p>No change</p>
<p>31) Question – Demand for employment sites - Do you think we should focus on supporting the growth of existing smaller businesses and companies on sub-divided former industrial sites?</p>	<p>There is a need to plan all forms of business and industry, addressing the needs of both existing employers in the borough and seeking to attract inward investment.</p> <p>The Issues and Options consultation material reflects that 'part of the borough's legacy of heavy industry is the sub-division of large industrial sites and premises that have then been occupied by smaller</p>	<p>There is a lack of available employment for companies to expand on, so companies have to look to expand on their current sites. The Council through the EDNA and BEAR work has looked at identifying employment development sites which could accommodate future employment growth.</p>	<p>No change</p>

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
	firms, creating clusters of smaller businesses.' This piecemeal use of former sites and premises is not typically the most efficient use of existing developed land or providing the right environment for supporting the growth of existing smaller businesses.		
31) Question – Demand for employment sites - There is evidence of demand for large sites for new inward investment in Sandwell from big companies, but the sites available for new business tends to be smaller ones and very few large vacant sites are available. Do you have any ideas or suggestions on	New larger strategic sites for employment, which are suited to modern commercial and employment needs and appropriately located to meet sustainability objectives, are likely to be a principal component of future supply. The potential exists for the recycling of some existing employment land, but there will be significant areas of former employment land that are life-expired in that use and better suited coming forward to help address local housing needs		No change
32) Questions – Non-conforming Employment Uses - Do you agree that these non-conforming employment uses should be addressed in the SLP?	BCP Policies EMP2 and 3, with consideration given to defining the type and scale of those uses in more detail.	The Council has given consideration to the policies in the draft BCP and how they fit the Sandwell Local Plan	No change
32) Questions – Non-conforming Employment Uses - If so, do you think the SLP should contain a policy addressing what ancillary uses might be appropriate and in what locations (e.g. where there are no suitable facilities within a short walk or where the ancillary use is not one that needs to be in a town	BCP Policies EMP2 and 3, with consideration given to defining the type and scale of those uses in more detail. Employment areas should contain a range of facilities for workers, but scale should be limited to prevent loss of employment premises.	The Council has given consideration to the policies in the draft BCP and how they fit the Sandwell Local Plan.	No change
33) Questions – Alternative Uses in Industrial Areas - Do	Yes, given the current shortfall in the supply of land for industry and the contribution that employment	All employment land within Sandwell has been assessed as part of the evidence	No change

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
<p>you agree that local employment estates / land / sites should be retained exclusively for local and small-scale employment uses?</p>	<p>land in Sandwell makes to the wider needs of Birmingham and the Black Country.</p> <p>Preparation of a new development plan be undertaken with a degree of flexibility and appreciation of the needs of an area to change, acknowledging that the future uses that should be planned for some existing employment sites is their release for housing development.</p>	<p>base for the BCP. This work has been transferred over to the SLP. Sites that scored over 30 in the BEAR will not be assessed for non employment uses. These sites are considered the High Quality Employment sites. This leaves the Local Quality and Other Employment sites, these sites have been assessed further to see if they are suitable for non employment uses such as housing. A number of sites have are considered only suitable for employment uses after further assessment against a number of hard constraints. Further assessment of the remaining employment sites will be will take place to see if they are suitable for alternative uses.</p>	
<p>33) Questions – Alternative Uses in Industrial Areas - Are there any circumstances where you feel non-employment uses would be appropriate in such areas?</p>	<p>Only when they help to support or maintain the business function of the wider employment area (as set out in draft BCP Policies EMP2 and EMP3).</p>	<p>The Council has given consideration to the policies in the draft BCP and how they fit the Sandwell Local Plan.</p>	<p>No change</p>
<p>33) Questions – Alternative Uses in Industrial Areas - If so, what sort of uses do you think would be appropriate?</p>	<p>The SLP should consider draft BCP Policies EMP2 and EMP3, as well as the list of appropriate uses which should be directed towards centres at Appendix (Centres) (Chapter 16) of the draft BCP, and with consideration as to how to make industrial areas more outward looking to the local communities in which they are located.</p>	<p>BCP Policies have been considered, need to work with the Centres Group on a list of uses that should be directed towards centres.</p>	<p>No change</p>
<p>33) Questions – Alternative Uses in Industrial Areas - Where else do you think larger community and commercial</p>	<p>Comments on the role of Industrial premises in meeting the need for indoor sport</p>	<p>Comment noted</p>	<p>No change</p>

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
activities like the examples given above should be located?			
33) Questions – Alternative Uses in Industrial Areas - How do we ensure that if such uses are allowed in employment locations, they do not proliferate / draw trade and activity away from town centres?	Recognising that such uses in those locations could (also) adversely impact on the vitality and viability of centres within Dudley Borough, through the sequential approach, and as appropriate Retail Impact Assessments, as set out within draft BCP Policy CEN6.	Comment noted Comment noted - BCP policy EMP will be carried over and amended to fit Sandwell	No change
34) Question – Training and Recruitment - We intend to update the existing SAD policy on training and recruitment. Do you agree?	Regard to be given to draft BCP Policy EMP5, particularly to avoid duplication.	Comment noted - BCP policy EMP will be carried over and amended to fit Sandwell	No change

Centres			
Main heading or question number	Support*	Object*	Comment*
6 . Thriving Towns	1	1	2
23) Questions – Retailing in Town Centres	1		2
What are the main issues you think our town centres and high streets are facing?	4		7
What can the SLP do to help them adapt to changing shopping trends – for example, by managing or promoting certain sorts of development within them?	3		3
Do you think more people should be encouraged to live in centres?	4		4
How can we identify sites in our town centres for future shopping, leisure and commercial / employment needs?			
Do you know of any suitable sites or premises in your local area that you think could be developed to provide modern town centre uses?			

Centres			
Main heading or question number	Support*	Object*	Comment*
Should Sandwell maintain a policy for controlling the balance of retail and non-retail uses in main town centre core frontages?	1		4
24) Question – Gateway Sites			1
Do we need to retain a policy referring to gateway sites? • If so, do we need to revise or update it in accordance with other potential policy areas of the SLP, such as those dealing with climate change mitigation or opportunities for increasing biodiversity and ecological value?	2		2
25) Questions – Town Centres			1
25) Questions – Town Centres Looking at the town centre boundary plans (Appendix B to this document), especially for the centre(s) you know best, do you think their current boundary: Is too big, Too small, Should be expanded			1
Are there any additional centres that you think should be “upgraded” to a similar status as the major centres identified above, because of their degree of activity or size?			
Thinking about the centre(s) you know best (maybe because you live in them or close by, or work in them), what do you think their good points are			1
What do you think their bad points are?			3
Do you think areas of denser residential development (e.g. flats above shops and office building conversions) in town centres should be located close to rail / metro links / public transport opportunities	4	1	5
7. West Bromwich	2	1	3
26) Questions – West Bromwich			
Thinking about West Bromwich Town Centre, do you think the issues listed above are the right ones for the Council to consider in the SLP	1	1	2
Are there any additional issues in West Bromwich you think should be included for consideration?			
27) Questions – West Bromwich Future Uses		1	3.

Main Heading/Question No	Key Issues Raised by the Representations	Council's Response	Proposed Change
6. Thriving Towns	<p>Seeks engagement with SMBC regards the Canal network, and full account of canal specific issues.</p> <p>Supports approach and wishes more emphasis on sustainable transport.</p>	<p>The Council concurs with this approach</p> <p>The Council fully supports sustainable travel in the SLP.</p>	<p>No change proposed.</p> <p>No change proposed.</p>
23 Retailing in Town Centres	Supports revitalising T Centres & espouses Wed Heritage Action Zone as an example	SLP promotes Wed HAZ as an exemple.	No change proposed.
What are the main issues you think our town centres and high streets are facing?	Traffic, need to diversify & repurpose centres ,quality of shops, effects on footfall on WFH	SLP addresses these issues, (however quality of shops is not readily addressable through the land use planning system.)	No change proposed.
What can the SLP do to help them adapt to changing shopping trends – for example, by managing or promoting certain sorts of development within them?	Regard should be had to list of appropriate uses in TC's, need to promote destination leisure activity.	SLP addresses these issues. Ie Major Leisure directed to Strat Centre. Appropriate uses is defined.	No change proposed.
Do you think more people should be encouraged to live in centres?	Broad support for policy, need to address conflicting uses stated.	SLP reflects these views, ie through 'Agent of Change' policy.	No change proposed.
Should Sandwell maintain a policy for controlling the balance of retail and non-retail uses in main town centre core frontages?	Yes, need for centre consolidation	Centres boundaries are reviewed where required in SLP.	No change proposed.

Do we need to retain a policy referring to gateway sites?	Yes: increasing biodiversity and ecological value espoused. Should be widened to include ie Rowley Hills, Chances Glassworks site	increasing biodiversity and ecological value promoted in SLP, Rowley Hills & Chances Glassworks have their own protected designations.	No change proposed
Looking at the town centre boundary plans (Appendix B to this document), especially for the centre(s) you know best, do you think their current boundary: Is about right	Bearwood boundary changes suggested	Bearwood TC boundary changes are proposed in SLP.	Bearwood TC boundary changes are proposed in SLP.
Thinking about the centre(s) you know best (maybe because you live in them or close by, or work in them), what do you think their good points are – for example, they have a safe and pleasant environment, a good range of shops and services, are attractiv	Various aspects of individual centres shortcomings raised ie crossings, traffic,type of shops, parking, ASB issues	SLP can only address certain aspects where appropriate: Off licences not a direct planning issue, parking enforcement not a Development Plan issue.	No change proposed
Do you think areas of denser residential development (e.g. flats above shops and office building conversions) in town centres should be located close to rail / metro	All representations on this issue supported this.	SLP promotes this.	No change proposed

links / public transport opportunities?			
7. West Bromwich	<p>Iterates importance of canals.</p> <p>Supports policy and wishes more, esp re sustainable travel</p>	<p>SLP includes policy on Canals, the desirability of which is the thrust of the representation.</p> <p>SLP promotes various non car based enhancements to the transport network, as does the W B Masterplan and Future High Streets Projects. These at least partly cover the representation</p>	No change proposed
Thinking about West Bromwich Town Centre, do you think the issues listed above are the right ones for the Council to consider in the SLP?	Promotes listed & locally listed buildings contribution to the Centre	SMBC is promoting a Local List of non designated heritage assets that will be a material planning consideration in development proposals.	No change proposed
Of the issues for West Bromwich listed above, which ones do you think the SLP should deal with first or more urgently? Please identify a "top three" if you can. Why do you think the issues you have identified are the most urgent ones?	Desirability of The Lyng industrial units adj housing to be replaced with residential.	Huge viability gap exists, also no relocation land available. Only when these issues resolved can this action be taken	No change proposed

27) Questions – West Bromwich Future Uses	Duplicate representation with above	Duplicate representation with above	No change proposed
If you don't visit West Bromwich often, or as often as you might previously have done, what would encourage / attract you to start going there again?	The closure of Sandwell College. The removal of the new bus station. Journey from Tipton Owen Street to West Brom takes too long	Outside parameters of SLP	No change proposed.

Transport			
Main heading or question number	Support*	Object*	Comment*
2 - Strategic Policies	1	0	0
3 – Climate Change	0	0	3
7 - Future Development in Sandwell	1	0	2
9 - Sustainable Locations	1	0	3
23 - Retailing in Town Centres	0	0	1
25 - Town Centres	1	0	1
38 - General Infrastructure	0	0	2
39 – Transport Infrastructure	0	0	3
40 – Greener Travel Networks	0	1	2
41 – Safe access and addressing transport impacts	3	1	0

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
2 - Strategic Policies	TRAN should be included given the cross-border nature of transport issues and opportunities	Agreed. A similar policy is included in the Draft plan.	No change proposed.
3 – Climate Change	Promoting alternative and low-carbon means of travel.	Agreed. This is a thread that runs throughout the Draft Plan.	No change proposed.
3 – Climate Change	Car use should be more actively discouraged, eg .through removal of car parks / on street parking in some local centres (which increase risk for cyclists, slow down buses and are inefficient uses of land in economic centres).	This will be looked at on a case-by-case and centre-by-centre basis. Where considered appropriate, this is included in the Draft plan.	New policy area in the Draft plan.
3 – Climate Change	By promoting the use of, and access to sustainable modes of transport, including cross-boundary cycle routes, footpaths and the Midland Metro system...	Agreed. Included in the Transport policies section of the Draft plan.	No change proposed.
7 - Future Development in Sandwell	Opportunities for transit orientated development should be captured.	Agreed. Included as a specific policy.	No change proposed.
7 - Future Development in Sandwell	Estates of detached homes with too much parking. If developments aren't within 15 minutes of local facilities, then they should be included within the development. Default should be LTNs with good walking and cycling routes and bus priority, or links to Metro/Rail/Sprint.	New parking policies allow for reduced car parking in accessible locations. The Draft plan does not advocate LTNs. It does however include specific policies that require developments to have good access by sustainable and active modes with key facilities within easy reach without the need to use a car.	New policy approach in the Draft plan.
7 - Future Development in Sandwell	Mixed use where suitable. Encourages 15 min neighbourhoods, less travel, less sprawl and inefficient use of space.	Mixed Use is proposed in suitable locations. The Draft plan does not include a 15-minute neighbourhood policy It does however require all new residential developments to be located so that key services are within easily accessible via sustainable modes.	No change proposed.
9 - Sustainable Locations	Development should be prioritised around sustainable transport growth nodes, e.g. around Metro stops.	Agreed. Included as a specific policy.	No change proposed.

9 - Sustainable Locations	The canal network offers great opportunities for this, but some routes have been shut off. Dudley Port train station is unsuitable for any disabled passengers and has no lift or access from Park Lane East because of steps. More cycle lanes in this area?	The Draft Plan includes policies relating to access to the canal network. A specific proposal is included that seeks the redevelopment of Dudley Port Station.	No change proposed.
9 - Sustainable Locations	Consideration should be given to accommodating and linking into cross-boundary cycle and footpath networks, e.g., National Cycle Network routes.	Agreed. The Local Plan commits to the West Midlands Metropolitan Cycle Network and the provisions of the emerging Black Country Cycle Strategy.	No change proposed.
9 - Sustainable Locations	Better planning of developments - link to existing green spaces, canals and cycle paths. More local facilities that are accessible within 15 minutes. Less car parking in local centres	Agreed. The Draft Plan includes policies which address all three points.	No change proposed.
23 - Retailing in Town Centres	Too much traffic, unpleasant environments, threats from out of town shopping areas	The issue of traffic in town centres and the means to reduce it are picked up in both the Centres policies and Transport policies in the Draft Plan.	No change proposed.
25 - Town Centres	Bearwood - too much traffic and on street parking. Remove on street parking to improve bus, walking, cycling, and encourage parking at Aldi for trips that require it. More could be done to encourage shops further along Bearwood Road to relocate to the main centre, rather than stretching it out so thinly.	The Draft Plan includes a section specifically covering Bearwood town Centre.	New policy approach in the Local Plan.
25 - Town Centres	The approach of locating areas of denser residential development in town centre close to key sustainable transport links is supported and considered to be in line with the NPPF (paragraphs 105, 120 and 127(a)).	Agreed. This is reflected in the Draft Plan.	No change proposed.
38 - General Infrastructure	Existing capacity and future provision for Electric Vehicle Charging Points (EVCPs) is becoming regionally important, both in the emerging strategies of partner transport and infrastructure agencies as well as the subject of planning applications for dedicated facilities.	Agreed. Draft Plan includes policies which support/require low/zero emission vehicles and transport innovation.	This is a new policy in the Draft Plan.
39 – Transport Infrastructure	Dudley Port Station is not accessible.	The Draft Plan includes proposals to redevelop Dudley Port Station to achieve	No change proposed.

		full accessibility and interchange with other modes.	
39 – Transport Infrastructure	The SLP should reflect the importance of partnership on all cross-boundary transport initiatives and in particular any development impacts on highway corridors that form part of the West Midlands Key Route Network (KRN) a key example being the A4123 corridor.	Agreed. The Draft Plan includes policies relating to the impact of development on the KRN.	This is a new policy in the Draft Plan.
39 – Transport Infrastructure	<p>Commit to road space reallocation, particularly where there are 2 or more lanes in each direction for vehicles. Any infrastructure should be designed / modelled for a set reduction in demand, eg 20% as per government aspirations.</p> <p>Bus lane heading from Bearwood to Cape Hill, including reconsideration of bus stop locations (ones before the traffic lights almost guarantee the bus will miss a cycle and have to wait for the next green light). Bus service and cycle lane from Bearwood to Smethwick Galton Bridge (the current section along Soho Way is excellent)"</p>	<p>The draft plan includes policies which focus on reductions in car use and, where appropriate, road space reallocation.</p> <p>Comments relate to existing infrastructure and are not matters that can be addressed through the Local Plan.</p>	<p>This is a new policy in the Draft Plan.</p> <p>No change proposed.</p>
40 – Greener Travel Networks	Does not agree with changing people’s behaviour. Public transport projects see money being wasted.	The constraints on the transport network, particularly the road network, mean that there has to be a reduction in single occupancy car use and more efficient use of the network. Public transport, particularly mass/rapid transit, is the principal means of achieving this.	No change proposed
40 – Greener Travel Networks	We expect that a package of the above measures may be required given existing constraints. In order to establish long term positive habits for walking and cycling amongst the community, there should be a focus on improving the quality of experience for users.	Agreed. The Draft Plan includes policies which promote active travel (walking, cycling and wheeling) along with commitments to deliver supporting infrastructure as well as requiring new development to do likewise.	No change proposed.

40 – Greener Travel Networks	As part of these options, the SLP should consider the opportunities for any cross-boundary initiatives that could help to promote greener travel networks across local authority areas.	Agreed. The Draft Plan includes policies that support cross-boundary initiatives.	No change proposed.
40 – Greener Travel Networks	Impacts on private vehicles should be completely disregarded from appraisal. Assume a certain level of demand reduction in scheme design - eg 20% government policy. Promote LTNs also. If restricted on space, should prioritise bus infrastructure as more likely to get the required mode shift, and quieter roads will be better for cyclists so have an indirect benefit.	<p>The appraisal methodology is set by Central Government and cannot be altered through the Local Plan.</p> <p>The Draft Plan supports initiatives to reduce the level of traffic in local neighbourhoods and in new development but does not explicitly advocate LTNs.</p> <p>The relative priority of public transport and cycle infrastructure will be taken on a case-by-case basis taking into account characteristics of the corridor.</p>	<p>No change proposed.</p> <p>No change proposed.</p> <p>This is a new policy in the Draft Plan.</p>
41 – Safe access and addressing transport impacts	Does not support the concept of 15-minute neighbourhoods.	The Draft plan does not include a 15-minute neighbourhood policy It does however require all new residential developments to be located so that key services are within easily accessible via sustainable modes.	No change proposed.
41 – Safe access and addressing transport impacts	Supports the concept of 15-minute neighbourhoods and linked to that of 45-minute region as set out in the West Midlands Local Transport Plan	The Draft plan does not include a 15-minute neighbourhood policy It does however require all new residential developments to be located so that key services are within easily accessible via sustainable modes.	No change proposed.
41 – Safe access and addressing transport impacts	Supports an emphasis on new innovative infrastructure and emerging technologies such as	Draft Plan includes policies which support/require low/zero emission vehicles and transport innovation.	This is a new policy in the Draft Plan.

	electric vehicle charging infrastructure, use of low emission vehicle technology etc.		
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Waste			
Main heading or question number	Support*	Object*	Comment*
10. Waste Management	0	0	3
36) Question – Strategic Waste Management	0	0	0
Do you think that a Strategic Waste policy is still required for Sandwell, to help identify suitable locations for new waste sites?	0	0	3
37) Question – Protection and Location of Waste Facilities	0	0	1
Do you agree that the SLP should contain a policy protecting Waste Sites from non-conforming development such as residential development?	0	0	4
Should employment areas be identified as suitable locations for the location of new waste facilities?	0	0	3
TOTAL	0	0	14

Include a summary of the main issues, a summary of the Councils' response and any proposed change in the table below.

Main Heading/Question No.	Key Issues Raised by the Representations	Councils' Response	Proposed Change
10. Waste Management	Along parts of the Tame Valley Canal, for example, fly tipping is a significant problem for the Trust. The source of the waste is mostly from neighbouring	Comment noted	No change

	residential properties. The Trust is already working with Sandwell Council's Environmental Health teams to investigate instances where and when this occurs, but we request Council continues to enhance its education and advice to its residents on the consequences and implications of fly tipping to our network and the wider Sandwell environment.		
10. Waste Management	Question 36/37 – if a waste strategy is going to be included within the Local Plan, then it needs to consider the implications for the historic environment, either through the creation of a strategic waste policy to address windfall waste sites or the appropriate location of new waste sites.	Comment noted, the Waste policies will include guidance on the location and design of new waste facilities so that any adverse effects on the surrounding environment is kept to a minimum.	No change
10. Waste Management	2. Section 10. There is inadequate levels of general litter removal in the area. Bins are not emptied quick enough and litter not cleared. There should be more focus on general litter collection (not relying on volunteers of which I am one) and more stringent policing of businesses and public to keep the areas tidy.	Comment noted	No change
Do you think that a Strategic Waste policy is still required for Sandwell, to help identify suitable locations for new waste sites?	<p>Yes. The Black Country is a net importer of waste and is therefore essential to the wider function of the linear, and increasingly circular, resource economy. The Black Country Waste Study (2019) identified additional waste management capacity will need to be delivered.</p> <p>Any policies for waste site allocation should also give consideration toward locations for non-hazardous landfill sites, drawing upon the latest available evidence and any landfill constraints studies undertaken at the West Midlands level by regional stakeholder groups.</p> <p>Waste policy should also include targets for the off-</p>	Comment noted - waiting for the update of the Wsdte Study	No change

	setting of waste to landfill in-line with the National Planning Policy for Waste.		
Do you think that a Strategic Waste policy is still required for Sandwell, to help identify suitable locations for new waste sites?	DMBC supports the principle of a strategic waste policy that helps identify suitable locations for new waste sites. It is expected that regard will be given to the draft BCP Policy W1, as amended and adapted to reflect SMBC circumstances. Joint working on strategic, cross boundary waste matters continues to take place between DMBC and SMBC as part of the preparation of individual Local Plans.	Comment noted	No change
Do you think that a Strategic Waste policy is still required for Sandwell, to help identify suitable locations for new waste sites?	DMBC supports the principle of a strategic waste policy that helps identify suitable locations for new waste sites. It is expected that regard will be given to the draft BCP Policy W1, as amended and adapted to reflect SMBC circumstances. Joint working on strategic, cross boundary waste matters continues to take place between DMBC and SMBC as part of the preparation of individual Local Plans.	Comment noted	No change
37) Question – Protection and Location of Waste Facilities	<p>The former Black Country Plan protected land immediately to the west of the Site, the Sims Metals Group land which currently contains a metal recycling facility. The former Black Country Plan also allocated this land as part of the same mixed use allocation that the Soho Foundry and Mint Site falls in.</p> <p>Whilst CHT recognise the importance of ensuring there is enough waste facilities in the area, the protection of Sims Metals may present a missed opportunity to enable a wider mixed-use regeneration of the area for all the land to the south of and bound by Rathbone Lane and Foundry Lane (all the land which forms part of former allocation Sme8). If an alternative location for Sims Metals was found, there may be an opportunity to deliver residential development on the wider Site and/or</p>	Comment noted, due to the lack of available employment land it would be difficult to relocate Sims	No change

	<p>deliver some significant public open space and recreation use along the canal in this location.</p> <p>Should the waste protection policy for the Sims Metals land be retained, CHT request that further measures are taken by Sims Metals to support the delivery of the Soho Foundry and Mint for heritage-led regeneration. CHT are engaging with Sims Metals to understand their plans for the future.</p>		
Do you agree that the SLP should contain a policy protecting Waste Sites from non-conforming development such as residential development?	YES, as well as former waste use sites such as Rattlechain Lagoon/ Rattlechain (Duport's Tip), Monks Tip etc	Comment noted	
Do you agree that the SLP should contain a policy protecting Waste Sites from non-conforming development such as residential development?	Yes, facilities that process waste from outside Sandwell should be protected against development on nearby land that might act as a constraint on continuing operations, as well as against development that might result in the loss of the facilities themselves. Some, but not all, existing employment areas will be suitable for new waste facilities: it will be helpful if these are identified and, if necessary, safeguarded for such use. It should however be noted that many modern forms of waste processing that operate inside a building will be suitable for almost any type of employment area.	Comment noted - SLP contains a policy protecting existing waste facilities from non conforming uses.	
Do you agree that the SLP should contain a policy protecting Waste Sites from non-conforming development such as residential development?	DMBC supports the principle of a policy protecting waste sites. It is expected that regard will be given to the draft BCP Policy W2, as amended and adapted to reflect SMBC circumstances.	Comment noted - SLP contains a policy protecting existing waste facilities from non conforming uses.	
Do you agree that the SLP should contain a policy protecting Waste Sites from	DMBC supports the principle of a policy protecting waste sites. It is expected that regard will be given to	Comment noted - SLP contains a policy protecting existing waste facilities from non conforming uses.	

non-conforming development such as residential development?	the draft BCP Policy W2, as amended and adapted to reflect SMBC circumstances.		
Should employment areas be identified as suitable locations for the location of new waste facilities?	No. There are too many areas specialising in "recyclable" materials which catch fire regularly defeating the object and inconveniencing local residents.	Comment noted	
Should employment areas be identified as suitable locations for the location of new waste facilities?	DMBC supports the principle of employment areas being identified as suitable locations for new waste facilities. It is expected that regard will be given to the draft BCP Policy W3 and Policy W4, as amended and adapted to reflect SMBC circumstances.	Comment noted - BCP Policies W3 and W4 have been amended to fit Sandwell circumstances	
Should employment areas be identified as suitable locations for the location of new waste facilities?	DMBC supports the principle of employment areas being identified as suitable locations for new waste facilities. It is expected that regard will be given to the draft BCP Policy W3 and Policy W4, as amended and adapted to reflect SMBC circumstances.	Comment noted - BCP Policies W3 and W4 have been amended to fit Sandwell circumstances	