

**Appeal by Wain Estates (Land) Ltd
Land North of Wilderness Lane, Great Barr**

Appeal ref. APP/G4620/W/24/3341688

LPA Ref. 23/000853/OUT

**Proof of Evidence – Housing Delivery and
Housing Land Supply**

Contents

Summary	3
1. Introduction	5
2. Relevant Planning Policy Context	8
3. The Need for More Homes in Sandwell Borough	9
4. Conclusions	28
Appendix 1: JR1 - Comparison of Sites in SAD DPD and current status of sites in 2024 AMR where now considered not deliverable	31
Appendix 2: JR2 - Comparison of the status of each action across the first four HDT Action Plans	32

Contact
[Redacted]
[Redacted]

Summary

1. My evidence addresses both housing delivery and housing land supply in Sandwell Borough.
2. I have considered the evidence that demonstrates the clear and compelling need for more sites to come forward to deliver more homes in Sandwell Borough.
3. Drawing that evidence together, the following findings can be summarised:
 - a. Against Sandwell's phased approach to its housing delivery, my evidence shows that the shortfall in delivery to date compared to the housing requirement in the Black Country Core Strategy stands at **4,167 homes**. Against an annualised requirement, this rises to **8,263 homes**. Whichever figure is taken, this is clearly a **very serious and very significant level of under delivery**.
 - b. In the plan period to 2026, the Council's own future supply figures show that this under-delivery will be **7,822 homes**. So, by the end of the plan period, the needs of nearly **8,000 households** will not have been met. Such under-delivery is not just of market homes, it will result in **serious consequences for the delivery of desperately needed affordable homes** (a matter considered further in the evidence of [REDACTED] for the Appellant).
 - c. When looking at the performance of the Sandwell Site Allocations DPD, my evidence finds that **43% of the homes** that were allocated on sites in the DPD have now been confirmed as **not developable**. Furthermore, against the DPD trajectory to 2021 (the period that plan was intended to run to), my evidence finds that the Council has delivered **16,128 fewer homes** than it expected. Reviews of that DPD and the Core Strategy that were intended by 2016, and which could have sought to tackle these under-delivery issues, have not materialised.
 - d. Against the Housing Delivery Test (HDT), my evidence shows that the Council has **failed the HDT in every year** since it was first introduced. The Council's HDT performance has continued to worsen, and it now stands at **only 47%**. This is predicted to worsen again to **41%** when the 2023 HDT results are published.

HDT Action Plans have had no impact on overall housing delivery rates and, indeed, delivery rates have continued to decline.

- e. My evidence also confirms that the Council is unable to demonstrate a sufficient housing land supply. Its supply, on its own figures, is only **1.4 years, a shortfall of 6,693 homes**. A shortfall in housing land supply has **existed since at least 2017** and, based on the Council's own future supply figures, a shortfall in housing land supply against local housing need **will persist in every five year period between 2024 and 2041**.
 - f. My evidence also confirms that the Council's emerging Local Plan will not meet local housing needs. The Council's proposed housing requirement will deliver **only approximately a third of the overall housing need**, leaving **unmet needs between circa 16,000 and 18,000 households**. The Council's emerging strategy of brownfield development, including on occupied employment land (a strategy my evidence shows to have failed), also means that the **level of unmet need can be expected to rise**.
4. Overall, whether considered alone or in combination, my evidence demonstrates that there is a clear and compelling need for more homes to be delivered on sites in Sandwell. The only remedy to seek to address the clear and compelling need for more homes in Sandwell Borough is to grant consents for homes on additional sites.
5. The consideration of whether there are very special circumstances that exists in this case in respect of Green Belt policy is dealt with in the planning evidence of [REDACTED] for the Appellant, however, in my view, the weight of evidence that I have presented to show the clear and compelling need for more homes in Sandwell Borough, is a consideration that I find should be afforded very substantial weight in the overall determination of the appeal.

1. Introduction

- 1.1 My name is [REDACTED], and I am a Senior Director at Turley. I am instructed to present evidence at this Inquiry by Wain Estates (Land) Ltd, herein referred to as 'the Appellant'.
- 1.2 This Appeal follows the Council's refusal of an outline planning application for 150 homes on Land North of Wilderness Lane, Great Barr.
- 1.3 My evidence addresses both housing delivery and housing land supply in Sandwell Borough.
- 1.4 The evidence which I have prepared and provide for this Appeal (PINS Reference No. APP/G4620/W/24/3341688) is true and has been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed are true and professional opinions.

Qualifications

- 1.5 I have an Honours Degree in Town & Country Planning and a Masters degree in Town Planning, both from the University of the West of England. I am also a Member of the Royal Town Planning Institute and have over 23 years' experience in the planning profession.
- 1.6 I joined Turley as a Director in November 2014, I held the role of Head of Planning South West (heading up Turley's Bristol and Cardiff Offices) between 2016 and 2022 and I now hold the position of Senior Director. Turley has been working in planning and property for over 40 years and is now one of the largest, leading planning practices in the UK, with offices in 14 locations.
- 1.7 Before my role at Turley, I practiced as a Planning Consultant with WYG for over 11 years, including as a Director from June 2013. Prior to that, I worked as a Planning Officer in Local Government at North Somerset Council for over 2 years.
- 1.8 I advise on a large range of development across many sectors, but hold a particular specialism in residential development where I provide strategic advice on residential promotions and progress numerous applications for development. I am currently advising on sites that, in total, will deliver over 20,000 new homes.

1.9 Since the publication of the 2012 National Planning Policy Framework (NPPF), and the inclusion of previous paragraphs 47¹ and 14² in that NPPF, I have also developed a particular specialism in the analysis of housing delivery and land supply, providing evidence on the requirement to demonstrate a five year housing land supply at numerous Local Plan examinations, appeal hearings and at public inquiries across the country. My experience in strategic residential development means that I am very familiar with the processes involved in promoting and progressing sites for residential development, including the overall challenges to housing delivery and supply and opportunities that can be taken to improve and boost supply³.

1.10 In that context, my evidence considers both the Council housing delivery performance against the housing requirement in its Development Plan and also the Council's ability to demonstrate a housing land supply sufficient to provide for five or four years' worth of housing, as required by paragraph 77 and 226 of the NPPF.

1.11 I have structured my evidence as follows:

Section 2 - I briefly consider the local policy context relevant to the consideration of housing delivery and supply;

Section 3 – I consider the evidence that demonstrates the clear and compelling need for more sites to come forward to deliver more homes in Sandwell Borough, including:

1. The Council's housing delivery since the beginning of the plan period in 2006 against the housing requirement in the Development Plan;
2. The Council's expected delivery of homes to the end of the plan period in 2026 to determine whether Sandwell is expected to meet its minimum housing requirement;
3. The Councils performance against the Housing Delivery Test since its introduction by the Government in 2018;

¹ Setting out the requirement to demonstrate a five year supply

² Setting out the presumption in favour of sustainable development

³ Noting the Government's overall policy imperative (at paragraph 60 of the December 2023 NPPF) to significantly boost the supply of homes

4. The Council's five year supply position for the period 2023 to 2028, its track record on housing land supply to date and a consideration how long a shortfall in housing land supply is expected to persist; and
5. The Council's emerging position on housing need and delivery through its draft local plan.

Section 4 - I set out my concluding remarks.

2. Relevant Planning Policy Context

The Development Plan and the Housing Requirement

2.1 For Sandwell Borough Council, the adopted Development Plan relevant to the Appeal Site currently consists of:

- The Black Country Core Strategy (adopted February 2011) which covers the period 2006 – 2026 (Core Document 2.1).
- The Sandwell Site Allocations DPD (adopted December 2012) (Core Document 2.5)

2.2 Black Country Core Strategy Policy HOU1 ‘Delivering Sustainable Housing Growth’ confirms that, across the Core Strategy area as a whole, sufficient land will be provided to deliver at least 63,000 homes in the period 2006 to 2026.

2.3 Table 7 to Policy HOU1 (page 66 of Core Document 2.1) confirms that, of the 63,000 homes, 21,489 homes are required to be delivered in Sandwell Borough. As this is part of the overall strategy to deliver 63,000 homes across the Black Country Core Strategy area, the 21,489 homes for Sandwell Borough must also be a minimum requirement.

2.4 Table 7 further confirms that, for Sandwell Borough, the following indicative phased net targets were expected:

Table JR1 – Indicate Phased Net Housing Delivery Targets for Sandwell Borough	
Period	Target Delivery
2006-2016	7,421 homes (742 homes per annum)
2016-2021	4,690 homes (938 homes per annum)
2021-2026	9,378 homes (1, 876 homes per annum)

2.5 Given the age of the Core Strategy, and indeed the DPD, and the age of the evidence base that would have supported the development of policies within them, these plans are clearly not up to date. This is considered further in the evidence of Mr Armfield.

3. The Need for More Homes in Sandwell Borough

3.1 This section of my evidence considers the various indicators in Sandwell that individually and collectively confirm a clear and compelling need for more homes to be delivered in the Borough. The following indicators are considered in this section of my evidence:

1. The Council's housing delivery since the beginning of the plan period in 2006 against the housing requirement in the Development Plan;
2. The Council's expected delivery of homes to the end of the plan period in 2026 to determine whether Sandwell is expected to meet its minimum housing requirement;
3. The Council's performance against the Housing Delivery Test (HDT) since its introduction by the Government in 2018;
4. The Council's five year supply position for the period 2023 to 2028, its track record on housing land supply to date and a consideration how long a shortfall in housing land supply is expected to persist; and
5. The Council's emerging position on housing need and delivery through its draft local plan.

Indicators of Housing Need: The Council's Housing Delivery to Date

3.2 As confirmed in Section 2 of my evidence Policy HOU1 of the Black Country Core Strategy confirms that **21,489 homes** are required to be delivered in Sandwell Borough in the period 2006 to 2026. This is a minimum requirement.

3.3 Policy HOU1 also confirms indicative phased net targets whereby:

- i. **7,421 homes** were expected to be delivered for the period **2006 to 2016**, (**742 homes/annum**);
- ii. **4,690 homes** were expected to be delivered for the period **2016 to 2021** (**938 homes/annum**); and
- iii. **9,378 homes** were expected to be delivered for the period **2021 to 2026** (**1,876 homes/annum**).

3.4 It is relevant to note that the Core Strategy is in excess of 5 years old and so, for the purposes of NPPF paragraph 77 and calculating five year housing land supply, LHN derived from the standard method calculation is to be used instead of the Core Strategy housing requirement. Nevertheless, the Core Strategy remains part of Sandwell's Statutory Development Plan and so the Council's performance against meeting that housing requirement to date and in the plan period as a whole is an important material consideration in the determination of this Appeal. Indeed, it is a material consideration that I say the Inspector should afford significant weight to.

3.5 Against the Core Strategy indicative phased housing targets (annualised for each phased period), Table JRT1, below, confirms that the following completions have been achieved:

Table JRT1: Sandwell's Housing Requirement in the Black Country Core Strategy Compared to Actual Completions⁴

	Year	Core Strategy Requirement (Using Policy HOU1 Table 7 Annualised Indicative Phased Targets)	Actual Delivery in Sandwell	Under or Over Delivery	Cumulative Under or Over Delivery
Pre- Core Strategy Adoption	2006 - 07	742	1,162	420	420
	2007 - 08	742	1,136	394	814
	2008 - 09	742	450	-292	522
	2009 - 10	742	505	-237	285
	2010 -11	742	549	-193	92
Post Core Strategy Adoption	2011 - 12	742	599	-143	-51
	2012 - 13	742	712	-30	-81
	2013 - 14	742	536	-206	-287
	2014 – 15	742	961	219	-68
	2015 – 16	742	558	-184	-252
	2016 – 17	938	901	-37	-289
	2017 - 18	938	676	-262	-551
	2018 - 19	938	794	-144	-695

⁴ Please see the figures provided in the May 2024 Sandwell Strategic Housing Land Availability Assessment ([Core Document 6.17](#)), Table 19 to verify these figures

2019 - 20	938	501	-437	-1,132
2020 - 21	938	654	-284	-1,416
2021 - 22	1,876	661	-1,215	-2,631
2022 - 23	1,876	340	-1,536	-4,167
Totals	15862	11,695	-4,167	-4,167

- 3.6 As can be seen from Table JRT1, prior to the adoption of the Black Country Core Strategy the Council achieved the housing requirement in the first two years of the plan period (although clearly this was a retrospective figure given that the Core Strategy was not adopted until 2011). However, since then, the Council has, in all years (aside from one year in 2014/15), **failed to meet its minimum housing requirement.**
- 3.7 Since the adoption of the plan in 2011 the Council has underdelivered on an annual basis in every single monitoring year. The cumulative shortfall accrued since adoption is -4,259 homes. The adoption of the plan has not only failed to address the shortfall at the point of adoption, which stood at -193 homes, but marked the start of a worsening pattern of delivery. This is a persistent failure to deliver much needed housing in the Borough.
- 3.8 At the current base date (1st April 2023) the level of under-delivery since the beginning of the plan period (2006) against the housing requirement stands at **4,167 homes**. This is clearly a **very serious and very significant level of under-delivery.**
- 3.9 Such under-delivery is against indicative phased net targets in the Core Strategy which included an initial low target of 742 homes between 2006 and 2016 and a slightly higher target of 938 homes in the period 2016 to 2021. However, if the overall requirement of 21,489 homes were to be annualised across the whole plan period, this would equate to a requirement of **1,074 homes per annum** (rounded down) and the Council's delivery performance against that annualised requirement would be as follows:

Table JRT2: Sandwell's Housing Requirement in the Black Country Core Strategy Compared to Actual Completions

	Year	Core Strategy Requirement (Annualised Across the Plan Period as a Whole)	Actual Delivery in Sandwell	Under or Over Delivery	Cumulative Under or Over Delivery
Pre- Core Strategy Adoption	2006 - 07	1174	1,162	-12	-12
	2007 - 08	1174	1,136	-38	-50
	2008 - 09	1174	450	-724	-774
	2009 - 10	1174	505	-669	-1,443
	2010 - 11	1174	549	-625	-2,068
Post Core Strategy Adoption	2011 - 12	1174	599	-575	-2,643
	2012 - 13	1174	712	-462	-3,105
	2013 - 14	1174	536	-638	-3,743
	2014 - 15	1174	961	-213	-3,956
	2015 - 16	1174	558	-616	-4,572
	2016 - 17	1174	901	-273	-4,845
	2017 - 18	1174	676	-498	-5,343
	2018 - 19	1174	794	-380	-5,723
	2019 - 20	1174	501	-673	-6,396
	2020 - 21	1174	654	-520	-6,916
	2021 - 22	1174	661	-513	-7,429
	2022 - 23	1174	340	-834	-8,263
	Totals	19958	11,695	-8,263	-8,263

3.10 As can be seen from Table JRT2, if the Black Country Core Strategy Housing Requirement were annualised across the whole plan period 2006 to 2026, the Council has failed to meet that requirement in any year since the beginning of the plan period.

3.11 At the current base date (1st April 2023) the level of under-delivery against the annualised housing requirement stands at **8,263 homes**. This provides further, compelling evidence of the sheer scale of under-delivery in Sandwell Borough.

3.12 Whether one uses the phased net targets or an annualised requirement, this is one of the worse levels of under-delivery I have seen in many years of undertaking such assessments.

3.13 This level of under-delivery is also expected to lead to serious consequences for the delivery of the Council's minimum housing requirement in plan period as a whole and for its overall housing delivery strategy. Indeed, when using the Council's own claimed assessment of its supply in the next 3 years to the end of the plan period in 2026, it is clear that there will increasing shortfalls in the level of delivery. This is further explored in the next section of my evidence, below.

Indicators of Housing Need – Sandwell Borough Council's Predicted Delivery to the End of the Plan Period in 2026 Against its Core Strategy Housing Requirement

3.14 Using the Council's own claimed deliverable supply in the next 3 years (using the figures provided in the May 2024 Sandwell Strategic Housing Land Availability Assessment (SHLAA) ([Core Document 6.17, Table 19](#)), Table JRT3 shows the level of additional under-delivery that is predicted to accrue in that period, and what the cumulative under-delivery will be at 2026 (the end of the Plan period).

Table JRT3: Sandwell's Housing Requirement in the Black Country Core Strategy Compared to Actual and Predicted Completions to 2026

	Year	Core Strategy Requirement (Using Policy HOU1 Table 7 Annualised Indicative Phased Targets)	Actual Delivery in Sandwell	Under or Over Delivery	Cumulative Under or Over Delivery
Actual Completions to date	2006 - 07	742	1,162	420	420
	2007 - 08	742	1,136	394	814
	2008 - 09	742	450	-292	522
	2009 - 10	742	505	-237	285
	2010 - 11	742	549	-193	92
	2011 - 12	742	599	-143	-51
	2012 - 13	742	712	-30	-81
	2013 - 14	742	536	-206	-287

	2014 – 15	742	961	219	-68
	2015 – 16	742	558	-184	-252
	2016 – 17	938	901	-37	-289
	2017 - 18	938	676	-262	-551
	2018 - 19	938	794	-144	-695
	2019 - 20	938	501	-437	-1,132
	2020 - 21	938	654	-284	-1,416
	2021 - 22	1,876	661	-1,215	-2,631
	2022 - 23	1,876	340	-1,536	-4,167
Predicted Completion	2023 - 24	1,876	926	-950	-5,117
	2024 - 25	1,876	433	-1,443	-6,560
	2025 - 26	1,876	614	-1,262	-7,822
	Totals	21490	13,668	-7,822	-7,822 ⁵

3.15 As can be seen from Table JRT3, the Council is expected to under-deliver against the Core Strategy minimum housing requirement in the next 3 years. It's cumulative under-delivery (using its own figures) when compared to the Core Strategy housing requirements will be by some **7,821 homes by the end of the plan period in 2026.**

3.16 It is clear that the Council's **housing delivery strategy has failed.** It has failed to deliver the planned homes to date and will fail, seriously and substantially, by the end of the plan period.

3.17 At the end of the plan period, the Council will be many thousands of homes short of the minimum housing requirement in the Core Strategy. Such under-delivery is not just of market homes, it will result in **serious consequences for the delivery of desperately needed affordable homes** (a matter considered further in the evidence of [REDACTED] for the Appellant).

⁵ Please note that the actual housing requirement is 21,489 so the under-delivery will be 7,821 homes.

Consideration of the Reasons for the Failure of the Council's Housing Delivery Strategy

- 3.18 I have also further explored some the potential reasons for this actual and predicted level of under-delivery.
- 3.19 Included at **Appendix JR1** is a table listing the site allocations referenced in the Site Allocations and Delivery Development Plan Document (the DPD, **Core Document 2.5**, adopted in December 2012. I have cross referenced this table with Table 16 of the LPA's latest SHLAA, May 2024 (**Core Document 6.17**). Table 16 of the SHLAA sets out a list of *'Sites allocated for housing but now considered not suitable / developable up to 2041'*. The table at **Appendix JRT1** demonstrates that the SHLAA is now stating that **4,545 homes** on sites allocated in the DPD, are **now no longer considered to be developable**. Out of the total quantum of homes allocated in the DPD (circa 10,600 homes), this represents around **43% of the total homes** allocated in that Plan. This is a further clear indication the failure of the Council's housing delivery strategy.
- 3.20 The Inspector will note that the sites that are no longer considered to be developable are brownfield redevelopment sites which, whilst laudable in respect of the aspiration to redevelop, are often (as has clearly been experienced In Sandwell) challenging to deliver. Table 16 of the SHLAA (**Core Document 6.17**) (and also copied across to the table at Appendix JR1) includes site specific delivery issues listed against each site. There are a range of reasons given; several related to the fact that there is no indication that the existing uses on the site intend to relocate, some relate to revised (non-residential) development having been progressed and in some cases the reason given is that it is too 'difficult' or 'expensive' for existing uses to relocate – all highlight the typical difficulties of bring forward such sites, but also shows that the Council strategy was reliant on the progression of sites with clear deliverability issues. These issues are further highlighted in my assessment of the Housing Delivery Test (HDT) results, and resultant HDT Action Plans, considered later in my evidence.
- 3.21 Beyond my identification of specific DPD allocations that have now been identified as not developable, a further failure of the DPD in terms of expectations compared to actual delivery can be seen by comparing actual housing unit completions in Sandwell between 2011 and 2021 (the end date of the DPD) to the expected Sandwell Housing Delivery Trajectory as contained in Appendix 2 of Plan (page 137 of **Core Document 2.5**). Table JRT4, below, provides this comparison.

**Table JRT4: Sandwell's Housing Projections (from the Site Allocations and Delivery DPD)
Compared to Actual Completions to 2021**

	Year	Actual and Projected Delivery in Sandwell ^[1]	Actual Completions	Under or Over Delivery	Cumulative Under or Over Delivery
Actual Delivery Pre-DPD	2006 - 07	1162	1,162	0	0
	2007 - 08	1136	1,136	0	0
	2008 - 09	450	450	0	0
	2009 - 10	505	505	0	0
	2010 - 11	549	549	0	0
Delivery Post DPD	2011 - 12	1042	599	-443	-443
	2012 - 13	1296	712	-584	-1,027
	2013 - 14	856	536	-320	-1,347
	2014 - 15	935	961	26	-1,321
	2015 - 16	4828	558	-4,270	-5,591
	2016 - 17	4595	901	-3,694	-9,285
	2017 - 18	2992	676	-2,316	-11,601
	2018 - 19	1809	794	-1,015	-12,616
	2019 - 20	1594	501	-1,093	-13,709
	2020 - 21	3073	654	-2,419	-16,128
	Totals	26,822	10,694	-16,128	-16,128

3.22 As can be seen, compared to the number of homes that the DPD expected to see delivered, over **16,000 fewer homes have actually come forward**. Indeed, as the Inspector will note, in some years, the DPD expected delivery of nearly 5,000 homes in a single year, but this was not nearly matched in terms of actual completions.

3.23 The base date of the DPD and the plan period runs to 2021. The intention was that the DPD would be subject to review (which was programmed for 2016) to consider the detail of post 2021 allocations. Paragraph 1.7 of the DPD confirms that:

^[1] The figures for 2006-2010 are taken from the 2024 AMR as the actual completions figures are slightly different to those reported in 2012 and listed within Appendix 2 to the DPD

“The long term residential sites indicated on the policy map accord with the BCCS broad areas and give an indication of where the post 2021 residential housing growth may emerge. The definition in detail of the post 2021 allocations will follow immediately after the review of the BCCS programmed for 2016.”

3.24 Paragraph 194 of the DPD further states that:

“The Council will continue to review the progress of the Site Allocations & Delivery DPD and produce further DPD’s or SPD’s if there is a change in circumstances. This could be triggered by the review of the Core Strategy in 2016.”

3.25 Neither a review of the DPD or the Black Country Core Strategy materialised. Furthermore, despite the notable failure of the DPD to deliver compared to its trajectory right from the beginning of the Plan, it is clear that no firm action in response to monitoring has been taken. This further highlights how and why the plan strategy has failed, and how issues have been left to perpetuate and grow to the sheer scale of under-delivery that we now see.

Indicators of Housing Need – The Housing Delivery Test

3.26 The Housing Delivery Test (HDT) was introduced by Government through the NPPF that was first published in July 2018 as a way to monitor whether a local planning authority is building enough homes to meet its housing requirement over a three-year period.

3.27 Since the HDT was introduced and since results have been published, Sandwell Borough has **consistently failed to meet delivery expectations**. Table JRT5 sets out the HDT results for Sandwell since 2018:

Table JRT5: Sandwell HDT Results Since 2018

HDT Results	Housing Requirement			Total	Housing Delivery			Total	Result	Implication
Year	15-16	16-17	17-18		15-16	16-17	17-18			
2018	838	1,346	1,325	3,509	562	883	692	2,137	61%	Buffer
Year	16-17	17-18	18-19		16-17	17-18	18-19			
2019	1,346	1,325	1,447	4,118	883	692	848	2,423	59%	Buffer
Year	17-18	18-19	19-20		17-18	18-19	19-20			
2020	1,325	1,447	1,351	4,123	692	848	467	2,007	49%	Presumption
Year	18-19	19-20	20-21		18-19	19-20	20-21			
2021	1447	1351	991	3789	848	467	654	1969	52%	Presumption
Year	19-20	20-21	21-22		19-20	20-21	21-22			
2022	1351	991	1466	3808	467	654	661	1782	47%	Presumption

3.28 As can be seen from Table JRT5, the Council has failed the HDT in every year since its introduction.

3.29 I also note that while the consequence has only been ‘presumption’ since 2020, this is due to the transitional arrangements associated with the HDT results. The scores of 61% and 59% achieved in 2018 and 2019 would, if considered now, also result in a consequence that the presumption should be applied.

3.30 Indeed, as can be seen, the Council’s HDT score has **worsened** since 2018 and, at 2022, the HDT score is only 47% (the lowest position since the HDT’s introduction).

3.31 Despite the implications of the HDT, it is clear that this has had little to no effect on improving housing delivery (measured through both the HDT and through the Council’s five year housing land supply – the latter which is considered in more detail below).

3.32 Indeed, based on completions in 2022/23, the Council’s own Housing Delivery Test Action Plan 2023 (April 2024) ([Core Document 6.26](#)) confirms the expectation that

Sandwell's HDT result will worsen further. This is shown in Figure JRF1, below, with the HDT result for 2023 predicted to be only 41%.

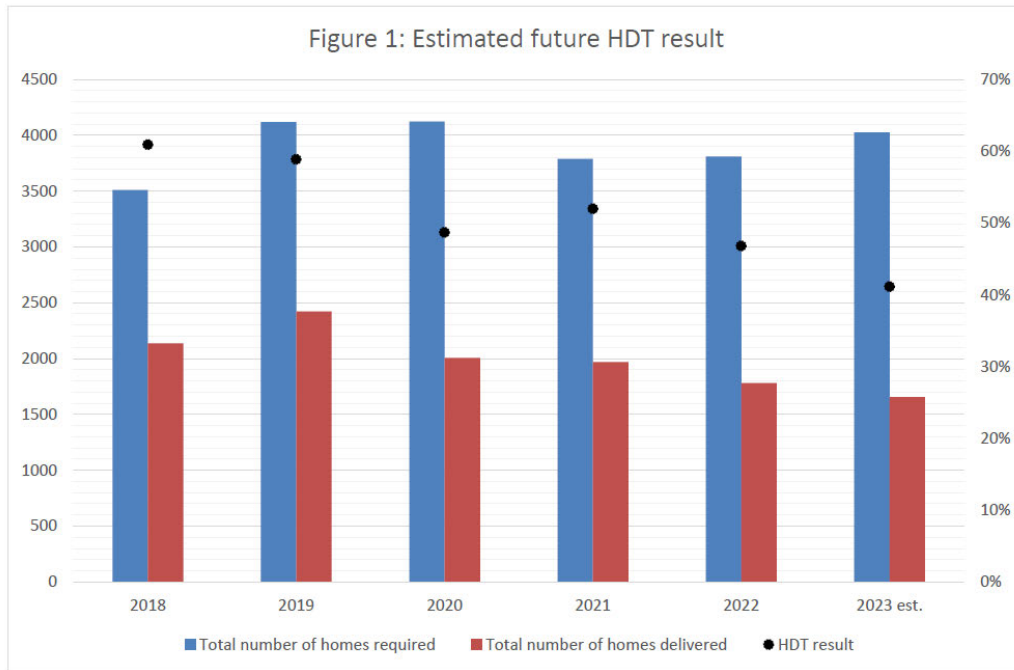


Figure JRF1 - Extract from Page 8 the Council Housing Delivery Test Action Plan 2023 (April 2024)

- 3.33 Whilst the Council has produced a 2023 Housing Delivery Action Plan (April 2024), it has also produced other action plans since 2019. Despite that, it is clear that these have made no material difference to housing delivery in Sandwell. Indeed, it has worsened and is predicted to worsen further.
- 3.34 Having reviewed the various Action Plans that have been produced by the Council (**Core Documents 6.22 to 6.26**) these identify that the key issues affecting the delivery of housing in the Borough are the presence of occupied employment uses; a lack of land to relocate those uses to; a lack of suitable vacant and surplus land; ground conditions and the lack of funds to assist with site assembly, relocation of existing business and for remediation of land. The Action Plans explain that the increase in demand for employment land has meant that the supply of brownfield land which was anticipated to come forward to meet the local housing needs has not materialised. These further confirm the issues I identified (at paragraph 3.20 of my evidence) that have stymied delivery and led to a failure of the Council's housing delivery strategy

- 3.35 In terms of actual, tangible actions taken in order to address the shortfall, I note that the summary of this in the Action Plans has broadly remained unchanged since the first Action Plan was published in 2019. The following text is replicated in all of the first four of the available Action Plans:

“The Council is actively seeking to both meet and exceed its housing targets, both through examining more closely the availability of locally derived opportunity sites in local town centres across the district and also through its partnership with the other Black Country authorities in establishing and working towards more strategic allocations across the HMA.”

- 3.36 The tables summarising the proposed Actions to be taken (in the 2019 to 2022 Action Plans) have the same 4 key outcomes, and broadly identical actions. Very little progress appears to have been made progressing these actions. I am aware that the 2023 Action Plan (published in April 2024) has slightly different wording and actions compared to the four previous iterations, however this document has not yet been endorsed by members, and, in my view, the outcomes and actions listed are not materially different to the preceding versions. The table at **Appendix JR2** provides a comparison of the status of each action across the first four action plans and shows the continuous repetition of actions across the plans. Whilst a limited number of actions have been progressed, equally there have been actions (such as a review of the Black Country Core Strategy, which has now been abandoned, given that agreement of the various Councils could not be reached). Overall, despite action plans have first been published 5 years ago, this clearly has not resulted in the outcomes intended i.e. improved delivery has not been achieved as envisaged and the supply position has continued to worsen. What is clear is that additional, and frankly different actions, need to be taken to address the Council’s delivery and supply issues. I am aware that the 2023 Action Plan (published in April 2024) has slightly different wording and actions compared to the four previous iterations, however this document has not yet been endorsed by members, and, in my view, the outcomes and actions listed are not materially different to the preceding versions.

- 3.37 In respect of HDT and some of the Actions being taken, I do note that the Council’s Statement of Case does suggest at para 6.20 that the permanence of the Green Belt assists urban regeneration in the Borough, including £3bn of regeneration pipeline projects on previously developed land. That is a matter considered in the evidence of Mr

Armfield, however, given the sheer scale of the shortfall in existing and future delivery that I have identified, it is in my view, not a position that could be credibly substantiated and I have seen no evidence to support this proposition. It is clear that Sandwell needs more homes and the delivery of more homes on a Green Belt site as is proposed at this appeal, will not affect the Council's regeneration efforts – both are required if any meaningful inroads into addressing housing needs (and shortfalls against those needs) are to be made.

Indicators of Housing Need – The Council's Five Year Housing Land Supply

The Council's Position on its Current Housing Land Supply

- 3.38 The Government expects (through paragraph 77 of the NPPF) local planning authorities who do not have an up-to-date plan (being more than 5 years old), to identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years' worth of housing or a minimum of four years' worth of housing if the provisions within paragraph 226 of the NPPF apply. For Sandwell, it is agreed that a 4-year housing land supply is required.
- 3.39 In respect of the housing need figure that a supply should be calculated against, paragraph 77 of the NPPF confirms that, where strategic policies are more than 5 years old, local housing need (calculated using the Government's standard method) should be used.
- 3.40 The Council's May 2024 SHLAA (**Core Document 6.16**) confirms, at paragraph 4.5, that LHN for Sandwell Borough is **1,550 homes**. Using that LHN requirement, the requirement in the next 5 years is **7,750 homes**.
- 3.41 Paragraph 77 of the NPPF also confirms that a 20% should be applied to the five year housing land supply requirement "*where there has been a **significant under delivery** of housing over the previous three years*" (my emphasis). Footnote 43 confirms that this will be measured against the Housing Delivery Test where this indicates that delivery was below 85% of the housing requirement.
- 3.42 As is confirmed by my evidence, above, the Council's latest 2022 HDT result was **only 47%**. Therefore, Sandwell is by definition, an authority that has *significantly under-delivered*, and it is necessary to apply a 20% buffer to the five year housing land supply

requirement. That increases the overall requirement in the five year period to **9,300 homes**.

- 3.43 Against that requirement of 9,300 homes in the five year period 2023 to 2028, the Council claims to have a deliverable supply of only **2,607 homes**. This equates to a supply of only **1.4 years** (a **shortfall of 6,693 homes**).
- 3.44 Whilst, in my view, there are sites that are included in the Council's claimed housing land supply that could be challenged in respect of their 'deliverability', given the level of supply that the Council accepts (at **1.4 years**), and the sheer scale of the shortfall (at **over 6,500 homes**), it is not considered to be a prudent use of inquiry time to further challenge the Council's supply. That is clearly a very serious and significant level of under-delivery and provides a further clear and compelling indication of the need for more homes, particularly on sites capable of delivering homes in the five year period.
- 3.45 Paragraph 70 of the NPPF confirms that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. Based on my experience promoting sites ranging from small sites (less than 10 homes) to very large sites of many thousands of homes, I consider the Appeal Scheme (at 150 homes) to be a medium sized site that is capable of being delivered quickly.

How Long has Sandwell Borough Not Been Able to Demonstrate a Sufficient Housing Land Supply

- 3.46 Beyond the current housing land supply position in Sandwell, I have further considered how long a shortfall in housing land supply has persisted in the Borough. Looking back at available records in the Councils SHLAA's, Table JRT6 confirms that the Council has accepted that it has been unable to demonstrate a sufficient housing land supply since 2017.

Table JRT6: Sandwell Track Record of Five Year Supply

Document, and Date Published (if referenced)	Base Date	Supply Position	Shortfall/ Surplus
Sandwell Strategic Housing Land Availability Assessment (SHLAA) 2016/17 Update	2017	4.55 years	-626
Sandwell Strategic Housing Land Availability Assessment (SHLAA) 2017/18 Update	2018	2.91 years	-3,626
Sandwell Strategic Housing Land Availability Assessment (SHLAA) 2018/19 Update	2019	1.69 years	-5,858
Sandwell Strategic Housing Land Availability Assessment (SHLAA) 2019/20 Update	2020	1.63 years	-5,926
Sandwell Strategic Housing Land Availability Assessment (SHLAA) 5 Year Housing Land Supply Published November 2022	2021	1.70 years	-5,998
Sandwell Strategic Housing Land Availability Assessment (SHLAA) 5 Year Housing Land Supply Published October 2023	2022	1.57 years	-6,240
Sandwell Strategic Housing Land Availability Assessment (SHLAA) 5 Year Housing Land Supply Published May 2024	2023	1.40 years	-6,693

3.47 As can be seen from Table JRT6, not only has the Council been unable to demonstrate a sufficient housing land supply since 2017, the level of shortfall has progressively risen and the overall level of supply is now the worst that it has been in that 7 year period.

How Long Can the Shortfall in Supply in Sandwell Borough Persist For?

- 3.48 Using Table 20 from the Council's May 2024 SHLAA (Core Document 6.17), which looks at the Council's potential housing trajectory to the end of the emerging plan period in 2041, it is clear that shortfalls in housing land supply can be expected to persist.
- 3.49 Table JRT7 shows that, based on the Council's own trajectory figures (and using a 2024 LHN, based on existing affordability ratios), significant shortfall in supply will result in every five year period between 2024 and 2026 (the final five year period to the end of the emerging plan period).

Table JRT7 – Future Five Year Calculation based on predicted completions

Period	24-29	25-30	26-31	27-32	28-33	29-34	30-35	31-36	32-37	33-38	34-39	35-40	36-41
LHN Req. with 20% buffer	9,300	9,300	9,300	9,300	9,300	9,300	9,300	9,300	9,300	9,300	9,300	9,300	9,300
Supply	3,055	3,552	3,775	3,766	3,739	3,329	2,995	2,626	2,622	2,637	2,792	2,854	2,880
5 Years Calc (years)	1.64	1.90	2.02	2.02	2.01	1.79	1.61	1.41	1.41	1.42	1.50	1.53	1.55
Shortfall	-6245	-5748	-5525	-5534	-5561	-5971	-6305	-6674	-6678	-6663	-6509	-6446	-6420

Indicators of Housing Need – The Sandwell Local Plan Review and Future Housing Need and Supply

- 3.50 The final indicator of housing need in Sandwell that I have considered is the level of future local housing need for Sandwell to 2041 compared to the supply of homes that the Council suggests is available.
- 3.51 Starting with the 2024 SHLAA, paragraph 11.8 confirms that:

“The Sandwell Local Plan review, which replaces the Black Country Plan, extends up to 2041. Using the current standard method, 27,900 homes would be required to meet Sandwell's local housing need over the Plan period (2023-2041), housing supply

over the same period is 11,253, therefore there is a shortfall of 16,647 homes.” (my emphasis).

3.52 The level of supply compared to need, and the increasing level of shortfall, is further illustrated by the below graph (provided at Figure JRF2) from the Council’s 2024 SHLAA⁶.

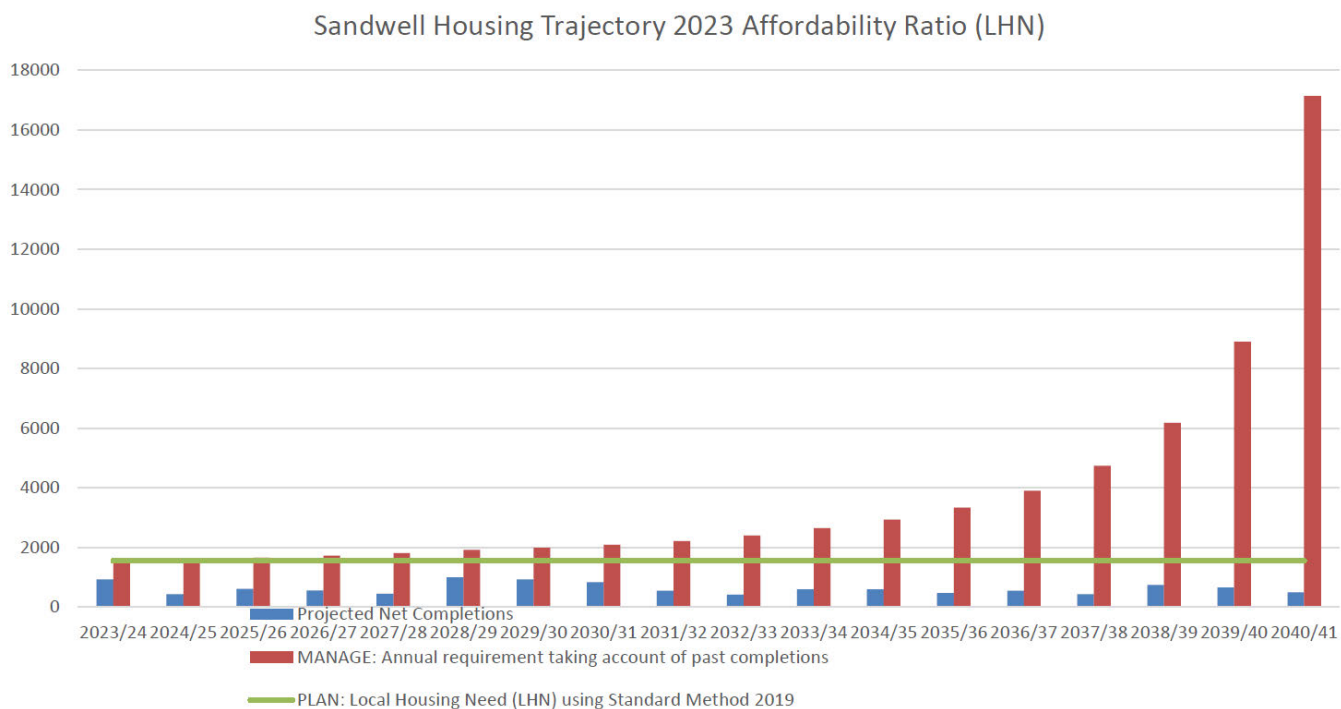


Figure JRF2 – Extract from the Council’s 2014 SHLAA (Core Document 16.7)

3.53 In respect of the emerging Sandwell Local Plan (**Core Document 3.1**), paragraph 2.6 states:

“There is still, despite the number of housing sites that have been identified and allocated, a shortfall in the numbers of houses that need to be built to meet identified needs. Housing need is calculated using the Government’s standard method based on household growth projections.

- Sandwell needs to identify land for **29,773** homes by 2041.
- The supply of suitable residential land based on the most recent evidence stands at **11,167** homes.
- There is an unmet need for **18,606** homes.

⁶ Core Document 6.17 and, whilst the document is unpaginated, it can be found on the very final page of the document.

- *The SLP provides for around one third of the housing need on the land that is available.”*

3.54 I note that the Council does not appear to question the level of local housing need that is calculated for the Borough using the standard method calculation. Instead, it appears to simply argue that it is unable to identify any more land that is available, and suitable for development.

3.55 At paragraph 2.7, the Council confirms that:

“There is a finite supply of land readily available for development and it is very likely that there is no scope to meet Sandwell's housing need within Sandwell itself. The Duty to Co-operate means that the Council is in communication with neighbouring authorities and is actively seeking their agreement to accommodate some of Sandwell's unmet need through their own housing provision.”

3.56 I am not aware that there is any formal agreement currently in place to address any of the unmet needs of Sandwell, and no weight can be placed on any potential for future agreement to meeting any of Sandwell's unmet housing need. On that basis (and between the SHLAA and Local Plan figures), we are currently looking at the needs of **circa 16,000 – 18,000 households going unmet**. Those are not just numbers; those are the needs of real people.

3.57 I am also concerned that the level of unmet needs could rise as a result of the continued housing delivery strategy being planned by the Council, a strategy that has led to significant levels of underdeliver to date. Flowing from the Council's suggested supply of suitable residential land, Policy SH01 of the draft Regulation 18 Sandwell Local Plan confirms that it is only planning to deliver 11,167 homes in the period 2022 to 2041, significantly below local housing need. It also suggests, at paragraph 7.4, that:

“97% of the supply is on brownfield land and 3% of the supply is on greenfield land.”

3.58 Paragraph 7.6 of the draft plan also states that:

*“The housing supply from allocations on occupied employment land has been discounted by 15% to take account of the **multiple delivery constraints that typically affect such sites** and that are likely to reduce delivery on a minority of sites. **Delivery constraints include poor ground conditions and the need for large-scale master-planning, land***

assembly, business relocations and residential service access improvements.” (my emphasis)

- 3.59 Despite the failure of the Council, through its present housing delivery strategy, to deliver anywhere close to the number of homes it was required to, it appears to have learnt little in that time and is proposing to take the same approach. The emerging strategy is one that continues to be reliant on brownfield land. Whilst laudable as an approach, in principle, one needs to carefully consider whether it remains an appropriate strategy given the inherent problems with reliance on such sites, clearly evidence by the delivery issued that have occurred to date.
- 3.60 As part of the Council’s brownfield approach, is also heavily reliant on the redevelopment of existing employment land (with Table 5 to Policy SHO1 showing that **2,234 homes are proposed on occupied employment land**). When looking at the deliverability of such sites, the Council on the one hand suggest that there are *multiple delivery constraints* that *typically* affect such sites, but on the other suggest that these constraints will reduce delivery on only a *minority of sites*. My research has shown that the Council is significantly underestimating the impact such constraints will likely have on delivery.
- 3.61 The overall proposed housing supply figure on existing employment land is one that has been discounted by 15%. However, my analysis of the Council’s current DPD shows that **43% of the homes** expected to be delivered on sites allocated the DPD have now been concluded as **not developable** – as I have explained earlier in my evidence, the continued occupation of such land and buildings and an absence of any desire to move, or lack of funding to do so, is a recurring issue that has led to those sites now being found as not developable. The Council’s continued reliance on such an approach seriously risks a further perpetuation of non-delivery and serious under-supply. That is also against a planned delivery of only **11,167 homes**, which is already over **16,000 homes short** of the actual local housing need for the Borough. There is currently no means of addressing this unmet need and, given the sheer scale of the shortfall, little prospect of such unmet needs being suitably addressed. There is also a significant volume of evidence to show that the Council’s emerging housing delivery strategy will lead to even higher levels of unmet need.

4. Conclusions

- 4.1 My evidence addresses both housing delivery and housing land supply in Sandwell Borough.
- 4.2 I have considered the evidence that demonstrates the clear and compelling need for more sites to come forward to deliver more home in Sandwell Borough.
- 4.3 Drawing that evidence together, the following conclusions can be reached:
1. Against Sandwell's phased approach to its housing delivery, the shortfall in delivery to date compared to the housing requirement in the Black Country Core Strategy stands at **4,167 homes**. Against an annualised requirement, this rises to **8,263 homes**. Whichever figure is taken, this is clearly a **very serious and very significant level of under delivery**.
 2. In the plan period to 2026, the Council's own future supply figures show that this under-delivery will be **7,822 homes**. So, by the end of the plan period, the needs of nearly **8,000 households** will not have been met. Such under-delivery is not just of market homes, it will result in **serious consequences for the delivery of desperately needed affordable homes** (a matter considered further in the evidence of Mr Roberts for the Appellant).
 3. When looking at the performance of the Sandwell Site Allocations DPD, 43% of the homes that were allocated on sites in the DPD have now been confirmed as not developable. Furthermore, against the DPD trajectory to 2021 (the period that plan was intended to run to), the Council has delivered **16,128 fewer homes** than it expected. Reviews of that DPD and the Core Strategy that were intended by 2016 and which could have sought to tackle these under-delivery issues have not materialised.
 4. Against the Housing Delivery Test (HDT), the Council has **failed the HDT in every year** since it was first introduced. The Council's HDT performance has continued to worsen, and it now stands at **only 47%**. This is predicted to worsen again to **41%** when the 2023 HDT results are published. HDT Action Plans have had no impact on overall housing delivery rates and, indeed, delivery rates have continued to decline.

5. The Council is unable to demonstrate a 4-year housing land supply. Its supply, on its own figures, is only **1.4 years, a shortfall of 6,693 homes**. A shortfall in housing land supply has **existed since at least 2017** and, based on the Council's own future supply figures, a shortfall in housing land supply against local housing need **will persist in every five year period between 2024 and 2041**.
6. The Council's emerging Local Plan will not meet local housing needs. The Council's proposed housing requirement will deliver **only approximately a third of the overall housing need**, leaving **unmet needs between circa 16,000 and 18,000 households**. It's emerging strategy of brownfield development, including on occupied employment land, also mean that the **level of unmet need can be expected to rise**.
- 4.4 Whether considered alone or in combination, I conclude that there is a clear and compelling need for more homes to be delivered on sites in Sandwell. The only remedy to seek to address the clear and compelling need for more homes in Sandwell Borough is to grant consents for homes on additional sites.
- 4.5 The consideration of whether there are very special circumstances that exists in this case in respect of Green Belt policy is dealt with in the planning evidence of Mr Armfield for the Appellant, however, in my view, the weight of evidence that I have presented to show the clear and compelling need for more homes in Sandwell Borough, is a consideration that I conclude should be afforded very substantial weight in the overall determination of the appeal.

**Appendix 1: JR1 - Comparison of Sites in SAD
DPD and current status of sites in
2024 AMR where now considered
not deliverable**

Appendix JR1 - Comparison of Sites in SAD DPD and current status of sites in 2024 AMR where now considered not deliverable							Sites no longer considered Deliverable (highlighted) - as listed
SHLAA Ref No.	SAD DPD site allocation Address	Site Area (ha)	SAD DPD Est. Capacity	Site Specific and Delivery Issues - as stated in SAD DPD	2024 AMR Site Specific Deliverability Issues		
Corridor 8: Hill Top							
Area H8.1 - Black Lake							
51	Cardigan Close/ Sussex Avenue	0.33	12	Vacant SMBC site - Council looking at residential development on site	Part of site built out, remaining site too small		-12
479	Kent Close/ Denbigh Drive, West Bromwich	0.76	24	SMBC owned site - would need master planning to bring site forward			0
654	Land to the south of Ridgacre Road, West Bromwich	1.11	35	SMBC owned site - currently leased out on long term lease	Occupier invested significantly to update and expand business. Will not be moving from the site		-35
657	Church Lane, West Bromwich	0.75	24	Company looking to relocate and sell the site for residential development	Occupier invested significantly to update and expand business. Will not be moving from the site		-24
632	Land at Junction of Black Lake and Swan Lane	1.25	39	Vacant industrial - not economically viable to redevelop for industrial uses, landowners looking at the potential for residential development			0
634	Land to north and west of Ridgacre Road	1.63	51	SMBC owned site - currently leased out on long term lease	Occupier invested significantly to update and expand business. Will not be moving from the site		-51
633	Land to east of Black Lake, West Bromwich	2.45	64	Currently occupied - companies looking to relocate/sell in coming years			0
804	Pembroke Way Hateley Heath, West Bromwich	2.30	60	SMBC owned site - would need master planning to bring forward	School playing fields - remove allocation		-60
		10.58	309				
Area H8.2 - Charles Street, West Bromwich							
439	Sheepwash Lane/Whitehall Road, Great Bridge	0.08	3	SMBC owned site - could be developed with sites 1120 and 1121	No indication that looking to relocate and no relocations sites available.		-3
550	Land between Tinsley St and Whitehall Road, Tipton	0.28	10	British Waterways consultation zone, near to Ryders Green Locks	No indication that looking to relocate and no relocations sites available.		-10
553	Whitehall Industrial Estate, Whitehall Road, Great Bridge	2.51	65	Industrial redevelopment not economically viable, owner looking at residential development of site	No indication that looking to relocation and no relocations sites available		-65
555	Land Between Whitehall Road and Walsall Canal, Great Bridge	0.75	23	Company would like to retain land for industrial use but residential future option	No indication that looking to relocation and no relocations sites available.		-23
1120	Garage on Whitehall Road, Great Bridge, Tipton	0.14	5	Owner would like see residential development, could be developed in conjunction with sites 439 and 1121	No indication that looking to relocate and no relocations sites available		-5
1121	Old Inn site, Sheepwash Lane, Great Bridge, Tipton	0.04	1	Currently occupied by a public house, could be developed in conjunction with sites 439 and 1120			0
		3.80	107				
Area H8.3 - Hill Top, West Bromwich							
1	New Street/ Norbury Road Hill Top	0.18	6	SMBC owned site - vacant premises, could be master planned with sites 799 and 802			0
50	Dial Lane/ Norbury Street/ Ebenezer Street, West Bromwich	0.82	26	SMBC owned site - would need master planning to bring site forward			0
86	Tunnel Road, Hill Top, West Bromwich	0.31	11	Situated within a SLINC and Wildlife Corridor			0
266	Dial Lane/ Peters Street, West Bromwich	0.39	13	SMBC owned site - would need master planning to bring site forward			0
412	Wedgewood Place, Harvills Hawthorn, West Bromwich	4.69	191	PFI Project - part completed/part to still be built out.			0
472	Harvills Hawthorn/ Anson Road, West Bromwich	0.32	11	SMBC owned site - would need master planning to bring site forward			0
533	Land at Bagnall Street, West Bromwich	1.94	106	The site has planning permission for 106 dwellings			0
538	Ebenezer Street, West Bromwich	0.11	4	SMBC owned site - would need master planning to bring site forward			0
539	Heronville Road/ Ebenezer Street, West Bromwich	0.15	5	SMBC owned site - would need master planning to bring site forward			0
799	New Street, Hill Top, West Bromwich	0.73	23	Part owned SMBC site - vacant site, could be master planned with sites 1 and 802			0
802	Site on the corner of New street Hill Top, West Bromwich	1.11	35	Part owned SMBC site - vacant site, could be master planned with sites 1 and 799			0
		10.75	431				
Area H8.4 - Holloway Bank, Wednesbury							
34	Holloway Bank, Wednesbury	5.71	149	Largest occupier would like to sell their site for residential development. Southern boundary falls within all zones of MAH Pipeline, HSE would not advise against applications for residential development provided that they are entirely further away than the middle zone and they are not intended specifically for sensitive populations (people who are elderly or require care). Part of the site is located with Flood Risk Zones 2 and 3.	Occupier invested significantly to update and expand business. Will not be moving from the site		-149
46	Mounts Road, Wednesbury	1.07	34	SMBC owned site - currently vacant and would require master planning to bring site forward	No indication that looking to relocation and no relocations sites available		-34
334	Mounts Road, Wednesbury	1.10	35	Site is currently occupied			0
788	Site off Mount Road Wednesbury	0.49	15	Site is currently occupied	No indication that looking to relocation and no relocations sites available.		-15
791	Corner of Bridge Street & Mounts Road, Wednesbury	3.15	82	The owner would like to retain the site for industrial uses	The owner would like to retain the site for industrial uses		-82
795	Site on corner of Woden Rd South & Bridge St, Wednesbury	1.61	50	Company supports future residential development of the site. The site is located in Flood Risk Zone 2.	No indication that looking to relocation and no relocations sites available.		-50
		13.13	365				
Area H8.5 - Darlaston Road, Wednesbury							
15	Darlaston Road/ Old Park Road, Kings Hill, Wednesbury	5.20	200	Company are looking to relocate to a more prominent location within the Borough and develop this site for residential, discussions held with Agents	No indication that looking to relocation and no relocations sites available.		-200
642	Kings Hill Trading Estate, Darlaston Road, Wednesbury	3.28	86	Currently occupied - no indication of the owners plans	Modern development with high occupancy, will not be moving from site.		-86
643	Old Park Trading Estate site on Old Park Road, Wednesbury	2.62	68	Multi occupancy on the estate - companies would require relocating	No indication that looking to relocation and no relocations sites available		-68
		11.10	354				
Area H8.6 - Wednesbury Town Centre							
94	Queens Gardens /Kings Court, Holyhead Rd, Wednesbury	1.15	36	Part of the site has been completed and part still under construction			0
		11.10	354				

Area H8.7 – Leabrook Road, Wednesbury						
45	Bannister Road, Wednesbury	2.22	58	The owner is looking at development options. Ground condition and overhead power cable issues. Possibly just within Outer MAH Pipeline, HSE would not advise against applications for residential development provided that they are entirely away from the middle zone and they are not intended specifically for sensitive populations (people would be elderly or require care)	Pylons on site and other constraints - remove allocation	-58
269	Leabrook Road/ Willingsworth Road, Tipton	0.37	12	Site part SMBC owned and contains a number of occupiers, who would require relocating	Part of site has pp for residential remainder of site too small	-12
		2.59	70			
Area H8.8 – Great Bridge						
						0
Ref No.	Address	Site Area (ha)	Est. Capacity	Site Specific and Delivery Issues		
154	Site on New Road, Great Bridge inc St Lukes Centre	0.40	14	Vacant site, the landowner is looking at the potential for residential development.	No indication that looking to relocate and no relocations sites available	-14
246	Beever Road, Great Bridge	1.01	35	Vacant site with ground issues and is situated within a Flood Risk Zone 1 area		0
		1.41	49			
Corridor 9: Dudley Port/Tividale/Brades Village						
Area H9.1 - Oldbury West / Dudley Road East						
966	Wellman Robey Ltd, Newfield Road, Oldbury	4.91	129	Land reclamation required	No indication that looking to relocation and no relocations sites available	-129
967	Birmingham Board Co Ltd, Dudley Road East, Oldbury	1	32	Relocation required	No indication that looking to relocation and no relocations sites available	-32
968	Beswick Paper, Dudley Road, Oldbury	0.96	30	Relocation required	No indication that looking to relocation and no relocations sites available	-30
1196	British Gas Plc, Land off Dudley Road, Oldbury	1.04	33	Land reclamation required	No indication that looking to relocation and no relocations sites available	-33
		7.91	224			
Area H9.2 - Brades Village						
76	Lower City Road, Oldbury	2.36	62	UDP allocation. Land assembly and reclamation required. Relocation of businesses		0
84	Former Accies & Pollock Sports Ground, Brades Rise, Oldbury	6.36	185	UDP allocation. Capacity as planning permission		
251	Land off Summertown Road, Oldbury (Phase Two)	1.36	61	UDP allocation. Capacity as planning permission		0
-	Summertown Road	1.41	44	UDP allocation. Land assembly and reclamation required. Relocation of businesses		0
310	City Road/ Dudley Road East, Oldbury	0.56	18	-		0
-	Land off Dudley Road East, Tividale	2.1	55	Land assembly and reclamation required. Relocation of businesses		0
1043	Land At The Junction Of Rose Lane Dudley Road East, Oldbury	0.33	24	Capacity as planning permission		0
1151	Land off Balfour Drive, Tividale	0.06	2	Capacity as planning permission		0
		14.54	451			
Area H9.3 - Rattlechain						
88	Dudley Road East, Brades Hall, Oldbury	1.85	58	Land reclamation required		0
752	Rattlechain Site, Land to the north of Temple Way, Tividale, Oldbury	14.70	257	Land reclamation required. Environment Agency concerns regarding flood risk		0
754	Land at junction of Roway Lane / Union Road, Oldbury	1.82	57	Environment Agency concerns regarding flood risk		0
1004	Temple Way (Rattlechain), Tividale, Oldbury	1.24	39	Land reclamation required. Environment Agency concerns regarding flood risk		0
		19.61	411			
Area H9.4 - Vaughan Trading Estate						
1239	CBF LTD, Wade Building Services, Groveland Road, Oldbury	1.26	40	Relocation of businesses	No indication that looking to relocation and no relocations sites available	-40
1240	Land adjacent to Cleton Business Park, Tipton Road, Tipton	0.56	18	Relocation of businesses		0
-	Vaughan Trading Estate	19.92	349	HSE concerns regarding gas pipelines. Environment Agency concerns regarding flood risk	Occupier invested significantly to update and expand business. Will not be moving from the site	-349
		21.74	407			
Area H9.5 - Coneygre						
80	Groveland Road, Dudley Port, Tipton	0.87	44	Relocation of businesses	No indication that looking to relocation and no relocations sites available	-44
89	Orchard Street, Burnt Tree, Tipton	0.28	10	UDP allocation	Part of site needed for junction / highway improvements. Remaining land not suitable for residential use.	-10
91	Park Lane West (South Staffs Depot), Tipton	2.95	77	UDP allocation	Existing pump station for Wednesbury remain as employment or white land	-77
151	Fisher Street / Coneygre Road, Tipton	1.7	54	Relocation of businesses	Indication from owners that remaining in employment use.	-54
878	Coneygre Road / Burnt Tree, Tipton	1.11	35	Relocation of businesses	Indication from owners that remaining in employment use.	-35
150	Coneygre	7.61	300	Capacity as outline planning permission	Owner advised will not be moving from site.	-300
		14.52	520			
Area H9.6 - Dudley Port						
67	Wellington Road, Tipton	0.97	31	UDP allocation		0
81	Station Street, Tipton	1.37	43	UDP allocation	Too difficult and expensive to move	-43
1115	Brook St, Oldbury	0.57	18			0
1080	Johns Lane, Tipton	0.18	9			0
238	Peel Street, Tipton	1.04	33	UDP allocation		0
		4.13	133			
Area H9.7 - Owen Street West						
93	Old Cross Street, Tipton	0.48	15	UDP allocation	Owner indicated different future use.	-15
265	Castle Street, Tipton	1.49	47	-	H&R no intention of moving, change to employment allocation	-47
774	Former Rounds Timber Yard, Castle Street, Tipton	0.29	15	Capacity as planning permission		0
779	Castle Street / High Street, Tipton	0.7	22	Relocation of businesses	Conflicting aspirations of land owners	-22

801	Bell Street / Dudley Road, Tipton	0.62	20	UDP allocation	H&R no intention of moving	-20
1144	Site Of 8 And 9 Castle Street Tipton	0.02	1	Capacity as planning permission		0
		3.6	120			
H9.8 - Alexandra Road						
302	Alexandra Road / Upper Church Lane / Locarno Road, Tipton	10.43	142	Environment Agency concerns regarding flood risk. Capacity as planning permission. Tipton AAP allocation	No indication that looking to relocation and no relocations sites available.	-142
1096	Cottage Spring, 97 Alexandra Road, Tipton	0.12	10	Capacity as planning permission		0
1169	Land adjacent to Work House Bridge, Upper Church Lane, Tipton	0.47	24	Capacity as planning permission		0
		11.02	176			
Area H9.9 - Great Bridge						
73	Whitehall Road, Great Bridge	0.41	13	UDP allocation		0
245	Land at Horseley Heath, Alexandra Road & Lower Church Lane, Tipton	2.3	60	UDP allocation		0
308	Mill Street, Great Bridge	1.84	58	UDP allocation. Environment Agency concerns regarding flood risk		0
1010	Mill Street, Great Bridge	0.10	4	UDP allocation		0
1116	Site surrounding former Post Office and Telephone Exchange, Horseley Heath, Tipton	0.63	20	Relocation of businesses		0
1117	Railway Street, Horseley Heath, Tipton	0.35	12	Relocation of businesses	No indication that looking to relocation and no relocations sites available	-12
1119	Salem Street, Great Bridge, Tipton	0.15 + 0.17	11	Relocation of businesses	Owner advised will not be moving from site	-11
		5.95	178			
Additional Sites						
1054	Albion Spring Co Ltd Oldbury, Road, Greets	0.49	15	-		0
1105	Rose And Crown, 57 Queens Road, Tipton	0.19	10	-		0
		0.68	25			
Corridor 12: Oldbury/West Bromwich/Smethwick						
Area 1 - Wolverhampton Road, Oldbury						
5	Wolverhampton Road and Anvil Drive, Oldbury	0.31	9	Capacity as per planning permission.	Owner advised not moving and too small to allocate for employment	-9
1101	Site of 50 Former Valentino Restaurant, Newbury Lane	0.19	1	Planning permission for residential care home		0
		0.50	10			
Area 2 - Titford Lane, Oldbury						
446	Lancaster House, Oldbury Road,	0.50	8	Council owned – flats currently being refurbished.		0
101	The Old Coal Yard, York Road,	0.62	29	Occupiers will need relocating.		0
1082	Former Gate Inn Oldbury Road	0.20	6	Currently used for small retail unit but residential potential in longer term		0
		1.32	43			
Area 3 - Ashes Road, Oldbury						
568	Ashes Road, Oldbury	1.45	46	Flood Zone 2 and 3 to the south of the site which will result in this part of the site being undevelopable.		0
1032	Former Starlight Auto Sales Wolverhampton Road	0.23	14	Capacity as per planning permission	No indication that looking to relocation and no relocations sites available	-14
		1.68	60			
Area 4 - Langley						
55	Mill Lane, Oldbury	2.40	62	Outline consent granted for up to 112 units but capacity calculated at less than this due to net developable area. Site affected by middle zone of Rhodia.		0
61	Mill Lane/Langley Green Road	1.23	37	Vacant site. Would require some reclamation which may add to costs significantly. Good location overlooking the canal and park opposite. Site affected by middle zone of Rhodia.		0
109	Clay Lane, Oldbury	0.28	12	Adjoining wildlife corridor and canal. Site affected by middle zone of Rhodia.	Owners advised not moving - too small to allocate for employment	-12
1042	Land At 13 - 23 Crosswells Road	0.24	14	Capacity as per planning permission. Site affected by middle zone of Rhodia.		0
		4.15	125			
Area 5 - Oldbury Town Centre						
466	Flash Road/ Broadwell Road, Oldbury	0.68	41	Part owned by council. Currently consists of mainly vacant units on busy ring road.	No indication that looking to relocation and no relocations sites available.	-41
1133	Seven Stars Road	2.51	186	Capacity as per planning permission		0
		3.19	227			
Area 6 - Rood End Road, Oldbury						
127	West End Avenue	0.32	11	Council owned site. School may require it in future for education use.		0
173	Seymour Road Amenity Space	0.13	14	Part of site developed		0
200	Fitzgerald Lighting LTD Rood End Road	1.39	44	Capacity as per planning permission	No indication that looking to relocation and no relocations sites available	-44
569	Former Sampson Works, Rood End Road	2.80	108	Capacity as per planning permission		0
614	Land adjacent to 88 Wellesley Road	0.26	8	Small site adjoining other residential units to the one side and industrial units to the other.	Site too small to carry forward	-8
		4.90	185			
Area 7 - Smethwick High Street and Environs						
210	Churchill Road, Smethwick	0.50	60	Site capacity calculated for family housing but site could accommodate apartments. Previous planning permission was for 60 units. Close to Smethwick District Centre.	No indication that looking to relocate and no relocations sites available	-60
482	Holly Lane, Smethwick	0.53	27	Currently a school and health centre occupy the site. School may relocate in the short term but health centre will also require relocation within the near vicinity.	Part of site built out, remaining site too small	-27
854	Oldbury Road Industrial Estate	0.57	18	Council owned estate which could be disposed of in near future. Adjoining proposed West Cross Local Centre.	No indication that looking to relocation and no relocations sites available	-18

		2.10	105			
Area 8 - North Smethwick Canalside						
116	North Smethwick Canalside	8.80	400	Long term phased development anticipated. Capacity based upon Smethwick AAP. Affected by Flood Zones 2 and 3.		0
121	Rabone Lane, Smethwick	5.98	200	Long term phased development anticipated. Capacity based upon Smethwick AAP. Affected by Flood Zones 2 and 3.	No indication that looking to relocation and no relocations sites available	-200
128	Mafeking Road	0.30	10	Vacant site. May be marketed for self build.		0
1300	Lewisham Road	5.15	193	Capacity taken from planning permission. CPO action may be required to assemble complete site.		0
		2.23	803			
Area 9 - Cranford Street						
125	Cranford Street, Smethwick	6.97	285	Part of site subject to planning application for 184 units. Remediation costs may be high - viability assessment shown scheme not viable including planning obligations.		0
206	Grove Lane	8.73	108	Masterplan prepared for site to include residential and Business B1 uses. Will need to be done in phased manner. Some occupiers will need relocating.		0
		15.70	393			
Area 10 - Windmill Eye						
119	Messenger Road Sites	2.70	80	Council owned sites. Subject to Planning Brief to be prepared. Marketing due to commence late 2011.		0
122	Unett Street/ Raglan Road	5.10	161	Dependant upon development on Messenger Road sites to enable decanting and re-housing to commence	Existing housing and open space - remove allocation	-161
123	Cape Hill/Durban Road	2.97	94	Dependant upon development on Messenger Road sites to enable decanting and re-housing to commence	No indication that looking to relocation and no relocations sites available.	-94
129	Sandwell College, Smethwick	2.41	84	Subject to opening of West Bromwich College early 2012		0
131	Windmill Lane/ Thomas Street	0.77	23			0
132	Windmill Lane, Smethwick	0.43	12			0
562	Bearwood Road, Smethwick	0.51	28	Capacity as per planning permission - almost completed		0
941	Former Cape Brewery Site	3.61	142	Capacity as per planning permission		0
1037	Tudor Works 36A Windmill Lane	0.25	24	Capacity as per planning permission	Site has pp for retention of shops and offices - no longer available	-24
1082	Charles Pearson Court, Mill Drive, Smethwick	0.05	5	Capacity as per planning permission		0
1175	Cape Hill Brewery Phase 3	0.42	13	Capacity as per planning permission		0
		19.29	666			
Corridor 13: Jewellery Line-Rowley Regis						
Area 13.1 - Woods Lane/Macarthur Road						
283	Woods Lane	8.11	212	Masterplan has been prepared in conjunction with landowners. Some relocations will be required, together with improved road access (which would enable closure of level crossing). Flood Zone of River Stour to be addressed by green buffer zone. Both sites at Woods Lane and Macarthur Road should be planned in a comprehensive manner to ensure the whole site is delivered and satisfactory provision is made for interdependent facilities. It could be subsequently developed in phases to reflect the availability of parts of the site		0
599	Macarthur Road	1.32	35	As above.		0
		9.43	247			
Area 13.2 - Corngreaves Road						
1301	Corngreaves Road	2.80	73	Site mostly in one ownership. Landowner has indicated willingness to redevelop.	Site assembly for residential development has proved too difficult due to the different landownerships and no relocation sites available	-73
		2.80	73			
Area 13.3 - Forge Lane/Silverthorne Lane						
282	Forge Lane/ Silverthorne Lane	2.81	74	Planning permission exists on part of site. Land assembly required for a number of ownerships. Relocations are required, included one designated hazardous use.		0
72	Lower High Street, Cradley Heath	0.60	19		Used as car park(temp planning permission) site merged with 3025	-19
586	Chester Road	2.38	63	Planning permission exists on much of the site. Additional land could be assembled to complete the proposed development.	Recent application for industrial unit, no indication that willing to move site	-63
		5.20	156			
Area 13.4 - South of Cradley Heath Town Centre						
268	Station Street/ Graingers Lane	1.30	41	Will require relocation of the major industrial use in order to bring forward the site.	No indication that looking to relocation and no relocations sites available	-41
280	Bridge Trading Estate	0.57	18	Site in single ownership.	No indication that looking to relocation and no relocations sites available	-18
281	Cokeland Place/ Graingers Lane	0.38	12	Site in single ownership.		0
1124	Cradley Road (East)	0.41	12		Council land surplus unsure of future use	-12
587	Cradley Road (West)	0.99	31		No indication that looking to relocation and no relocations sites available	-31
		3.65	114			
Area 13.5 - Newlyn Road/Oldfields						
259	Newlyn Road	2.72	83	Masterplan has been prepared in conjunction with landowners, and planning application submitted. Some relocations will be required, together with improvements to the road access.	Businesses seeking to expand and will not be moving	-83
260	Oldfields	1.64	51	Included in above masterplan, but would be a later phase; need for land assembly, relocations, and potential remediation.	No indication that looking to relocation and no relocations sites available	-51
896	Newlands	0.65	20	Included in above masterplan. Would need relocations of existing occupiers (under investigation).	Businesses seeking to expand and will not be moving.	-20
1302	Spinners End	0.71	22	As above.	No indication that looking to relocation and no relocations sites available	-22
		5.72	176			
Area 13.6 - North of Cradley Heath Town Centre						
933	Foxoak Street, Newtown Lane, Providence Street	4.82	126	Some owners have indicated willingness to redevelop. Requires land assembly. Flood Zone of Mousesweet Brook to be addressed by green buffer.	No indication that looking to relocation and no relocations sites available	-126
1303	Bank St, Cradley Heath (West of Kimber Drop Forgings site)	1.3	6		No indication that looking to relocation and no relocations sites available	-6

1107	Yew Tree Social & Labour Club	0.62	20	Site with existing planning permission		0
396	Thorncroft Way/ Brackendale Drive Yew Tree	0.32	11	Area remaining from UDP housing allocation still suitable for residential		0
		0.94	31			
HOC 5 – Charlemont and Stone Cross						
1040	Corner of Hall Green Road, West Bromwich	0.35	22	Site with previous planning permission for residential		0
96	Beaconview Road, West Bromwich	0.76	27	UDP allocation to be carried forward		0
25	Hall Green Road, West Bromwich	5.20	136	The site is close to local facilities and open space. It is a former landfill site owned by a development company, and architects have been appointed. Site investigations are underway (ground conditions are difficult, including extensive contamination requiring both on-site and off-site remediation techniques). A planning application is anticipated in 2011/2012.		0
		6.31	185			
HOC 6 – West Bromwich						
74	Land at corner of Bank Street and Church Lane	0.85	27	UDP allocation to be carried forward		0
		0.85	27			
HOC 8 – Friar Park						
16	Land at Friar Park Road, Wednesbury	36.22	633	Site suitable for residential, mixed use & community development. Master planning of the site will be needed to ensure a holistic approach to development. Site has good access to the 404 Smart Route and Tame Bridge Railway Station. Issues around road access will have to be resolved before development progresses and substantial land remediation will be necessary to facilitate development. The former industrial area at the eastern boundary of the site has been subject to restoration following the closure of the industrial premises. The site is bounded at its northern edge by Bescot sidings and then the M6, issues around noise and lighting from these uses will need to be carefully considered for residential use to be established. Redevelopment of Manor Secondary School will also be needed as part of the sites development along with addressing nature conservation issues regarding the SLINC.		0
77	Social Club, Friar Park Farm, Kent Road, Wednesbury	1.96	61	Site consists of Social club and detached residential house with gardens. Bescot sidings are to the north. Site is in two ownerships & residential development would sit easily within the surrounding area.		0
1003	Alma Street, Wednesbury	0.52	19	Site with existing planning permission		0
43	Friar Street, Wednesbury	1.25	38	Newly identified site suitable for residential development. Currently industrial unit.		0
		39.95	751			
HOC 9 – North Wednesbury						
1074	Brunswick Park Road, Wednesbury	0.25	13	Site with existing planning permission		0
1047	Brunswick Park Trading Estate, Wednesbury	0.39	58	Site with existing planning permission	Site with permission and part complete, does not look as though other part will be completed still occupied	-58
		0.64	71			
HOC 11 – Tibbington						
262	Summerhill Primary School, Central Ave, Tipton	1.09	40	Existing Tipton AAP Allocation	School has expanded so no longer available	-40
263	United Steels Ltd, Upper Church Lane Tipton	1.58	80	Existing Tipton AAP Allocation	Owner advised will not be moving from site	-80
		2.67	120			
HOC 12 – Darby's Hill						
1142	Oakham Road, Tividale	0.35	23	Site with existing planning permission		0
2	Newbury Lane, Oldbury	0.70	24	Existing UDP allocation still suitable for housing		0
		1.05	47			
HOC 13 – Tipton Green						
1182	Admirals Way/ Victory Ave Rowley Regis	1.41	36	Site with existing planning permission		0
40	Tipton Green, Hawes Lane, Rowley Regis	1.13	40	Potential for residential subject to resolution of major issues	No indication that looking to relocation and no relocations sites available	-40
1135	Allsops Hill Rowley Regis	0.38	13	Potential for residential subject to resolution of major issues. Existing UDP allocation	Site not developable	-13
1282	Land at Tipton Green, Rowley Regis	4.47	150	Potential for residential subject to resolution of major issues around habitat creation and long term management of open space	Owner advised that may look to bring site forward but unsure of timescale or end use	-150
97	Reservoir Road, Rowley Regis	0.76	30	Remaining UDP Allocation still suitable for housing		0
99	Hawes Lane, Rowley Regis	0.56	20	Potential for residential subject to resolution of major issues concerning open space. Part of site is existing UDP		0
		8.71	289			
HOC 15 – South Cradley Heath						
111	Haden Cross, Cradley Heath	2.75	42	Site with existing planning permission		0
		2.75	42			
HOC 16 – Brandhall						
218	Sandwell College, Oldbury Campus, Brook Road	2.40	117	Site with existing planning permission		0
		2.40	117			
HOC 18						
1281	Fmr Sunlight Laundry, Stanhope Rd, Smethwick	0.73	40	Existing housing allocation pending permission		0
431	Wilson Road / Sycamore Road Smethwick	1.07	37	Existing AAP Allocation	Being developed for an alternative use	-37
208	Vince St/ Bearwood Road, Smethwick	0.34	32	Site with existing planning permission UC		0
		2.14	109			
Total number of homes now listed as not deliverable						-4545

Appendix 2: JR2 - Comparison of the status of each action across the first four HDT Action Plans

Appendix JR2 - Comparison of the status of each action across the first four HDT Action Plans

Outcome/Action	2019 based HDT Action Plan	2020 based HDT Action Plan	2021 based HDT Action Plan	2022 based HDT Action Plan
OUTCOME – PRODUCE A LOCAL PLAN (BLACK COUNTRY PLAN) WITH SUFFICIENT LAND FOR NEW HOMES				
Action 1 – Consult on Issues and Options	complete	complete	complete	complete
Action 2 – Carry out a ‘Call for Sites’	complete	complete	complete	complete
Action 3 – Consult on Draft Plan	not started	not started	complete	complete
Action 4 – Consult on Publication	not started	not started	not started	no agreement reached
Action 5 – Submission of Plan	not started	not started	not started	not started
Action 6 – Examination	not started	not started	not started	not started
Action 7 – Adoption	not started	not started	not started	not started
OUTCOME – USE PLANNING TOOLS TO PROVIDE CERTAINTY OF WHAT IS ACCEPTABLE / SUITABLE ON RESIDENTIAL				
Action 1 - Produce Black Patch Interim Statement to set vision for the area and identify new areas that will be a material consideration should applications for residential use be submitted.	complete	complete	complete	complete
Action 2 – Produce Interim Statement for West Bromwich Town Centre and West Bromwich Master Plan Statement to set vision for the Town Centre and identify where residential use would be acceptable, it can then be used as a material consideration should an application for residential use be submitted. It seeks to deliver additional residential units.	in progress	in progress	in progress	complete
Action 3– Establishment of Development Ready http://www.sandwell.gov.uk/info/200186/regenerating_sandwell/2437/sites	complete	complete	complete	complete
Action 4– Implement Intervention Areas – Friar Park – Prepare a Remediation Strategy	complete	complete	complete	complete
Action 5– Implement Intervention Areas – Greater Icknield and Smethwick (Grove Lane) – Submit bid for HIF for Highway improvement and a new primary school. Prepare Master Plan for phased approach	bid complete, masterplan to be commissioned	bid complete, masterplan to be commissioned	bid complete, masterplan commissioned	bid complete, masterplan commissioned
Outcome – Build Council Homes				
Action – Develop programme to build Council Homes				
Action 1 – Build 244 Council homes by Q3 2019 as set out in the Council House Build programme	complete	complete	complete	complete
Action 2 – Programme next round of sites to be developed	in progress	complete	complete	complete
Action 3 – Seek approval for sites to be added to the housing delivery programme	in progress	complete	complete	complete
Action 4 – Assess feasibility of sites for housing from review of Council Land Asset Register	in progress	in progress	in progress	in progress
Action 5– Implement Intervention Areas – Greater Icknield and Smethwick (Grove Lane) – Submit bid for HIF for Highway improvement and a new primary school. Prepare Master Plan for phased approach	n/a	n/a	in progress	in progress
Action 5 - Action 3 – Seek approval for sites to be added to the Council housing delivery pipeline programme (Regeneration and Growth pipeline) – working on next programme which will look at additional sites from the existing pipeline, Council Land Asset register and windfall sites. It will also include affordable housing element for larger master planning areas i.e. Friar Park/ Brandall. Cabinet Approval – TBC	n/a	n/a	n/a	in progress
Action –				
Action – Review Council Land Asset Register				

Action 1 – Review asset site register for Rowley Regis	complete	complete	complete	complete
Action 2 – Review asset site register for West Bromwich	complete	complete	complete	complete
Action 3 – Review asset site register for Wednesbury	not started	complete	complete	complete
Action 4 – Review asset site register for Tipton	not started	started	complete	complete
Action 5 – Review asset site register for Smethwick	not started	not started	not started	to be updated
Action 6 – Review asset site register for Oldbury	not started	not started	not started	to be updated
Action – Investigate Establishing Housing Company				
Action 1 – Set out steps to be undertaken to assess whether a Housing Company can be implemented	in progress	complete	complete	complete
Stage 2 – Create Business Model and Validated Business Plan	n/a	complete	complete	complete
Stage 2b – Consultants complete work and work reported to Cabinet for approval	n/a	in progress	in progress	complete
Stage 3 & 4 – Set up the company	n/a			in progress
Outcome – Apply for Funding to Help Bring Sites Forward				
Action 1 – Received LEP funding for Woods Lane development for £4.7m which resulted in the development of 135 homes	complete	complete	complete	complete
Action 2 – Friar Park - produce Cabinet Report to get approval to enter into a collaborative agreement with WMCA	complete	complete	complete	complete
Action 3 – Apply for LEP funding for 6 site investigations at Beever Road, Tipton; Hawes Lane, Rowley Regis; Meredith Street, Rowley Regis; Oxford Street, Wednesbury; Tippity Green, Rowley Regis and the Grove, West Bromwich. Sites were put forward through the review of Council assets.	complete	complete	complete	complete
Action 4 – Seek Cabinet approval to submit an application for funding to the Black Country LEP for remediation work at King Street, Wednesbury; Mounts Road, Wednesbury and Stanhope Road, Smethwick to enable residential redevelopment.	complete	complete	complete	complete
Action 5 – King Street and Stanhope Road – Have Cabinet approval (subject to SIU sign off) to enter into a grant agreement.	n/a	in progress	complete	complete
Action 5 – The Farley Centre, West Bromwich - Explore potential for financial assistance from WMCA for viability gaps and relocation of existing businesses	in progress	in progress	in progress	in progress
Action 6 – Bull Street / Princess Parade – Explore potential for financial assistance from WMCA for viability gaps and relocation of existing businesses	in progress	in progress	in progress	complete
Action 7 – St Michael's Square, West Bromwich - Explore potential for financial assistance from WMCA for viability gaps and relocation of existing businesses	in progress	in progress	in progress	in progress

Turley Office
40 Queen Square
Bristol
BS1 4QP

T [REDACTED]