



Sandwell
Metropolitan Borough Council

SANDWELL
HOUSING DELIVERY TEST
ACTION PLAN
2023

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1.0 Introduction and background

- 1.1 Sandwell Council's Vision 2030 sets out ten ambitions to make the borough a thriving, optimistic and resilient community by 2030. Ambition 7 reads:

We now have many new homes to meet a full range of housing needs in attractive neighbourhoods and close to key transport routes

- 1.2 The strategic housing policies for Sandwell within the Development Plan are more than five years old and so the borough's housing need is calculated using the standard method set out in national planning guidance. The Government's Housing Delivery Test measures the number of homes delivered in the borough against housing need. Sandwell scored 47% against the 2022 Housing Delivery Test.
- 1.3 The Council has prepared this Housing Delivery Test (HDT) Action Plan which sets out reasons for under-delivery of housing, explores ways to reduce the risk of further under-delivery and sets out actions to bring sites forward.

2.0 Why is a HDT Action Plan being prepared?

- 2.1 The Government is committed to delivering more new homes across the country. To this end it has introduced various measures and reforms to the planning system intended to deliver more housing, improve housing affordability and remove barriers to development. Local planning authorities are challenged to be more proactive in increasing the speed and quantity of housing supply to meet the identified housing needs of their local area.
- 2.2 The Housing Delivery Test (HDT) has been introduced by the Government as a monitoring tool to demonstrate whether local areas are building enough homes to meet their housing need. The HDT will be used to determine if a 20% buffer will apply in housing supply assessments and also whether the presumption in favour of sustainable development should apply when determining planning applications for housing.
- 2.3 The consequences of failing the Test are set out in the NPPF. These consequences will apply until subsequent Test results demonstrate that delivery has recovered:
- a) all LPAs with a Test result of less than 95% must prepare an Action Plan within six months to assess the causes of under-delivery and identify actions to increase delivery in future years;
 - b) all LPAs with a Test result of less than 85% must provide a 20% buffer to the Five-Year Land Supply and prepare an Action Plan; and
 - c) the presumption in favour of sustainable development applies if the test result is less than 75%, as well as the 20% buffer and need to prepare an Action Plan.

3.0 How is the HDT measured?

- 3.1 Full details of the method for calculating the HDT are specified within the '[Housing Delivery Test Rule Book](#)' and [Planning Practice Guidance](#). The data used to assess delivery are Department for Levelling Up Housing and Communities (DLUHC) statistics for the total net housing completions in a local planning authority (LPA) area over a rolling three-year period. This includes student accommodation and other communal accommodation, using a ratio to adjust for occupancy. The calculation compares the number of new homes delivered over the previous three years with the authority's housing requirement.¹

¹ The housing requirement is either the lower of the latest adopted housing requirement or the minimum annual local housing need figure. Where the adopted housing requirement is more than five years old, the minimum annual local housing need figure will apply.

- 3.2 Financial years are used for monitoring and test results are usually published annually in November by DLUHC.
- 3.3 As the adopted housing requirement for Sandwell is more than five years old (through the Core Strategy which was adopted in 2011), the council's HDT has been assessed against the minimum annual local housing need figure. The NPPF explains that local housing need should be calculated using the standard method set out in national planning guidance.

4.0 Development Plan status

- 4.1 The current adopted development plan comprises:

The Black Country Core Strategy (2011)

- 4.2 This is a strategic planning document that covers the four Black Country authorities, Dudley MBC, Sandwell MBC, City of Wolverhampton Council and Walsall MBC and covers the period 2006 – 2026. It sets the housing requirement for the Black Country and for each authority. For Sandwell the total requirement is 21,489 net homes or 1074 per annum. It also sets an indicative phasing for the delivery of:

- 2006-16 – 7421 homes
- 2016-21 – 4690 homes
- 2021-26 – 9378 homes

- 4.3 It does not allocate sites but identifies broad locations for housing and employment uses.

Sandwell Site Allocations and Delivery DPD (2012)

- 4.4 This is the 2nd tier document that builds on the Black Country Core Strategy and provides allocations and local policies within the Borough until 2021, excluding the West Bromwich AAP area. It has a requirement for 12,257 net homes or 817 per annum.

West Bromwich AAP (2012)

- 4.5 This sets the vision and strategy for the future development of West Bromwich Town centre and its immediate catchment area until 2026. It has a requirement for 3508 net homes or 175 per annum.

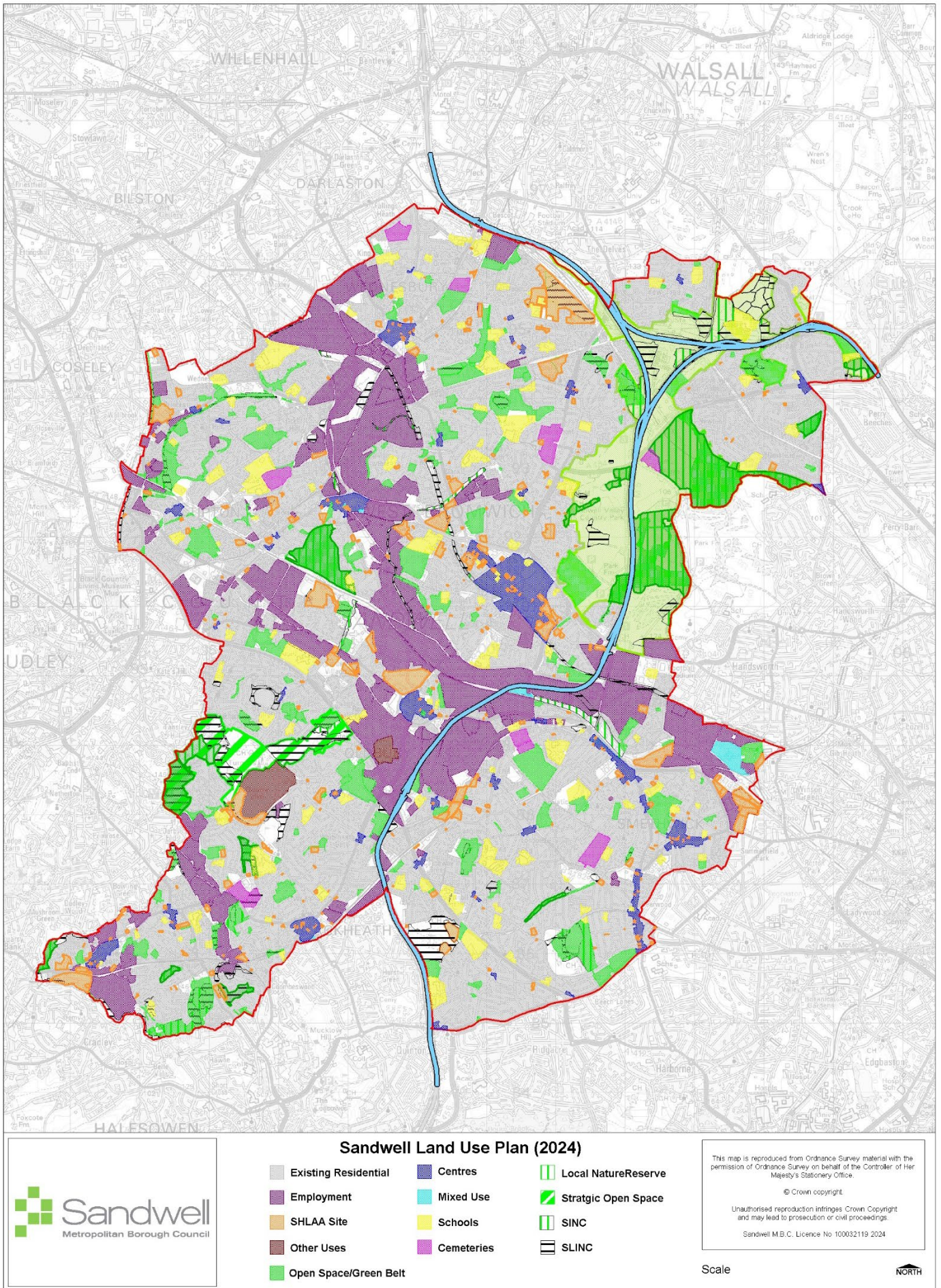
Smethwick AAP (2008) & Tipton AAP (2008)

- 4.6 Both these documents provide the vision for how the areas will be developed, however their housing requirements are encompassed in the BCCS and SAD.

Land Use Plan

- 4.7 Map 1 highlights all sites currently allocated or with planning permission for housing, employment use, public open space. It also shows schools and existing built-up areas. It highlights that most of the land within Sandwell has been allocated for varying uses leaving a limited amount of surplus land. It identifies that one of the major barriers to delivering housing in the future is the shortage of a supply of suitable land and sites.

Map 1: Sandwell Land Use Plan (2024)



5.0 Future Development Plan and other initiatives

Sandwell Local Plan

- 5.1 The Council is preparing a new [Local Plan for Sandwell](#). Once adopted, the Sandwell Local Plan will replace all current development plan documents and will provide the framework for the long-term planning of the borough until 2041.
- 5.2 A draft version of the Local Plan was published for Regulation 18 public consultation in November – December 2023. The draft version identifies land for 11,167 homes over the plan period. This is around a third of the 29,773 housing need calculated using the standard method, and the council is working with the other local authorities within the Birmingham and Black Country Housing Market Area to agree how Sandwell's unmet need could be distributed.
- 5.3 The council is working to an ambitious timetable to prepare and adopt the Local Plan:
- Public consultation on the Publication Sandwell Local Plan (Regulation 19) – summer 2024
 - Submission to Secretary of State and Examination in Public – late 2024 to early 2025
 - Adoption – late 2025 to early 2026

Black Country Plan

In October 2022 the four Black Country authorities published a statement explaining that they have been unable to reach an agreement on the approach to planning for future development needs within the framework of the Black Country Plan. Local Plans for each of the four Black Country authorities will now provide the framework for the long-term planning of the Black Country. The Black Country Plan 2039 work programme has ended and now each authority will now prepare Local Plans for their own areas.

This Action Plan also supports delivery of the following documents / initiatives:

[Vision 2030](#)

- 5.4 This Action Plan supports delivery of: Ambition 7 - We now have many new homes to meet a full range of housing needs in attractive neighbourhoods and close to key transport routes

[Sandwell Housing Strategy and Action Plan 2023 – 2028](#)

- 5.5 This Action Plan supports priorities within the Housing Strategy and Action Plan:
- Priority 1 – providing more affordable homes
 - Priority 3 – quality housing for all

[Sandwell Regeneration Strategy 2022-2027](#)

- 5.6 The Regeneration Strategy identifies and seeks to support the delivery of £2.9 billion of regeneration projects within the borough which are being delivered by public and private stakeholders. This includes the delivery of at least 4,000 new homes.

[Sandwell Business Growth Plan 2023](#)

- 5.7 The Council continues to support stronger businesses and thriving communities through its Business Growth Plan. The Plan seeks to support business to invest in Sandwell to growth the borough economy.

Intervention Areas

- 5.8 There are three main focus areas for regeneration within Sandwell. In the north of the borough a joint venture agreement with West Midlands Combined Authority and Sandwell Council has resulted in the publication of a [masterplan](#) for the former sewage works at

Friar Park which together with the adjacent council owned land is known as Friar Park Urban Village. The land will be remediated in order to bring forward a family orientated high quality residential led mixed-use development of up to 630 new homes and associated facilities.

- 5.9 A [masterplan and Interim Planning Statement](#) for West Bromwich has been prepared for the strategic town centre sites. It identifies potential diversification of uses, introducing more town centre living alongside other mixed-use development to address the contraction of retail requirement and re-purposing sites for alternative higher density residential options, leisure and educational facilities.
- 5.10 The council worked collaboratively with Birmingham City Council, West Midlands Combined Authority, Homes England, Canal & River Trust and Sandwell and West Birmingham Hospitals Trust to prepare an [Area Wide Framework](#) covering the regeneration corridor from Smethwick High Street in Sandwell to City Hospital in Birmingham. Consultants were commissioned to undertake the cross-boundary Area Framework which also involved more detailed master planning at Grove Lane to compliment the current regeneration taking place around the new Midland Metropolitan University Hospital, due to open in late 2024. The regeneration proposals within the Masterplan, which was approved by Cabinet in February 2022, will look at delivering up to 800 new homes, a primary school and associated infrastructure. The Council has since adopted an additional [masterplan for Rolfe Street](#) which seeks to support the comprehensive regeneration of the industrial area to create 688 new homes.

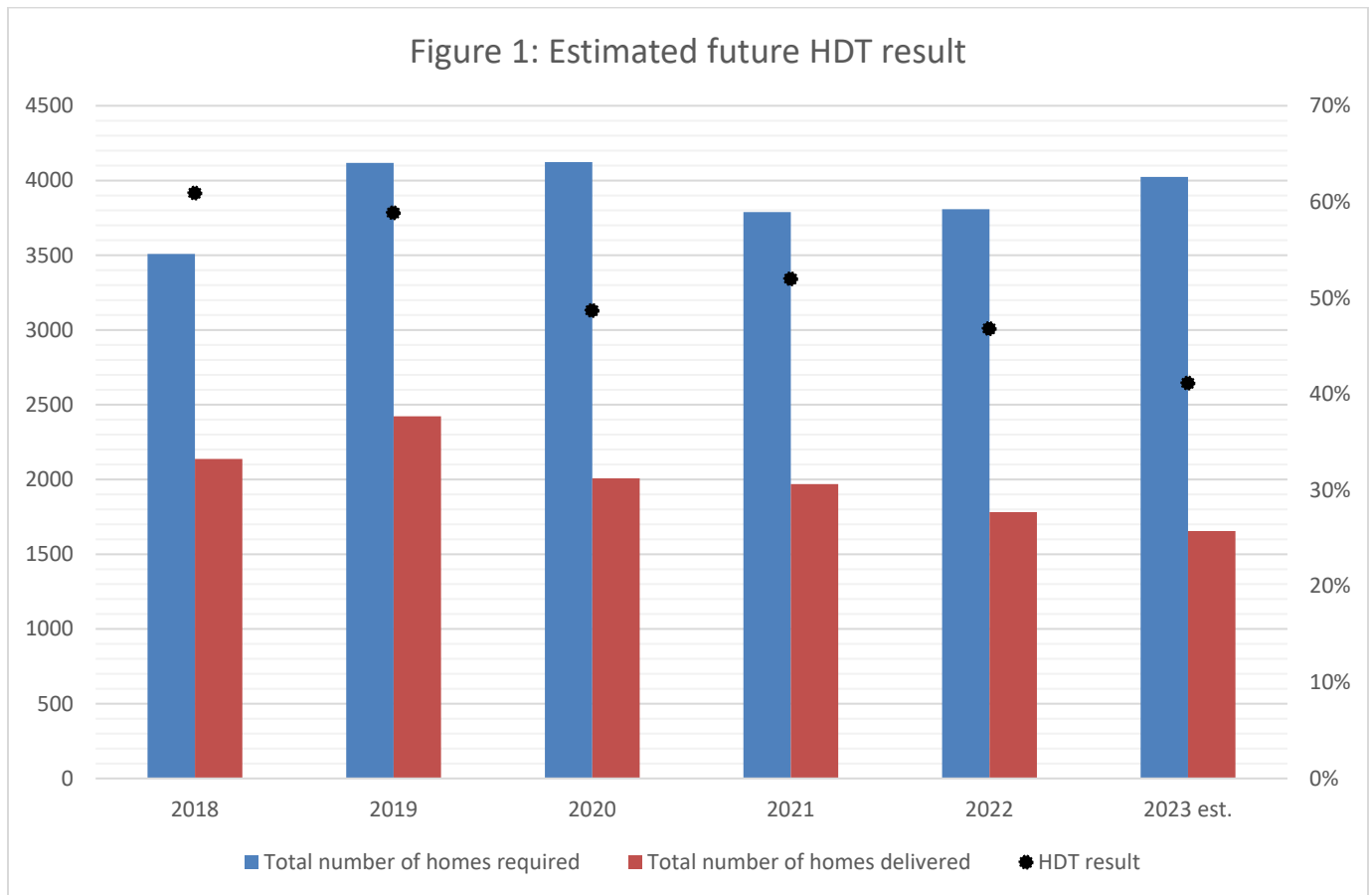
6.0 How did Sandwell perform against the HDT?

- 6.1 Government published the [2022 HDT results](#) in December 2023. Sandwell scored 47% which means that the Council is required to produce an Action Plan, add a 20% buffer onto the Five-Year Land Supply and the presumption in favour of sustainable development applies when determining relevant planning applications.

Table 1: HDT Results

HDT results year	Number of homes required / per year			Total number of homes required	Number of homes delivered per year			Total number of homes delivered	Housing Delivery Test: % Measurement	Housing Delivery Test consequence
2018	838	1346	1325	3509	562	883	692	2137	61%	Action plan; 20% buffer;
2019	1346	1325	1447	4118	883	692	848	2423	59%	Action plan; 20% buffer; Presumption in favour
2020	1325	1447	1351	4123	692	848	467	2007	49%	Action plan; 20% buffer; Presumption in favour
2021	1447	1351	991	3789	848	467	654	1969	52%	Action plan; 20% buffer; Presumption in favour
2022	1351	991	1466	3808	467	654	661	1782	47%	Action plan; 20% buffer; Presumption in favour

6.2 Based on completions recorded for 2022/23 and an estimation of the number of homes required (these figures can change due to applying the affordability factor) the chart below shows that it is anticipated that Sandwell will have a measurement for 2023 of 41%. Based upon these estimations, a buffer and action plan will be needed again next year.



7.0 Current Housing Supply and Delivery Rates

Local Context

7.1 Table 2 shows housing completions in Sandwell between 2006 and 2023 against the adopted Black Country Core Strategy.

7.2 Completions dropped off around 2008/9 onwards due to the impact of the global financial crisis on development activity. Every year since 2015 the number of completions has been below the indicative phased plan target and annualised target. Completions in 2022/23 were noticeably lower than previous years, and even lower than during the height of the global financial crisis in 2008/09.

Table 2: Housing Completions in Sandwell between 2006-2023 compared with the Black Country Core Strategy Phased Requirement

Year	Sandwell gross completions	Sandwell demolitions and losses of residential units	Sandwell net completions	Black Country Core Strategy indicative phased plan target (2011)	Annualised target
2006/2007	1514	352	1162	742	1074
2007/2008	1401	265	1136	742	1074
2008/2009	676	226	450	742	1074
2009/2010	596	91	505	742	1074
2010/2011	662	113	549	742	1074
2011/2012	771	172	599	742	1074
2012/2013	736	24	712	742	1074
2013/2014	564	28	536	742	1074
2014/2015	970	9	961	742	1074
2015/2016	575	14	561	742	1074
2016/2017	917	16	901	938	1074
2017/2018	692	16	676	938	1074
2018/2019	822	28	794	938	1074
2019/2020	501	0	501	938	1074
2020/2021	660	6	654	938	1074
2021/2022	661	0	661	938	1074
2022/2023	341	1	340	1876	1074
Total	13059	1361	11698	14924	18258
Shortfall				3226	6560

7.3 Table 3 sets out current supply by type of land, its brownfield or greenfield character and the status of the site, whether it is allocated in the plan or if it has planning permission.

7.4 The high percentage of sites that are brownfield land reflects the strategy in the BCCS for 95% of sites to be brownfield.

Table 3: Current supply by previous use (adapted from SHLAA 2022)

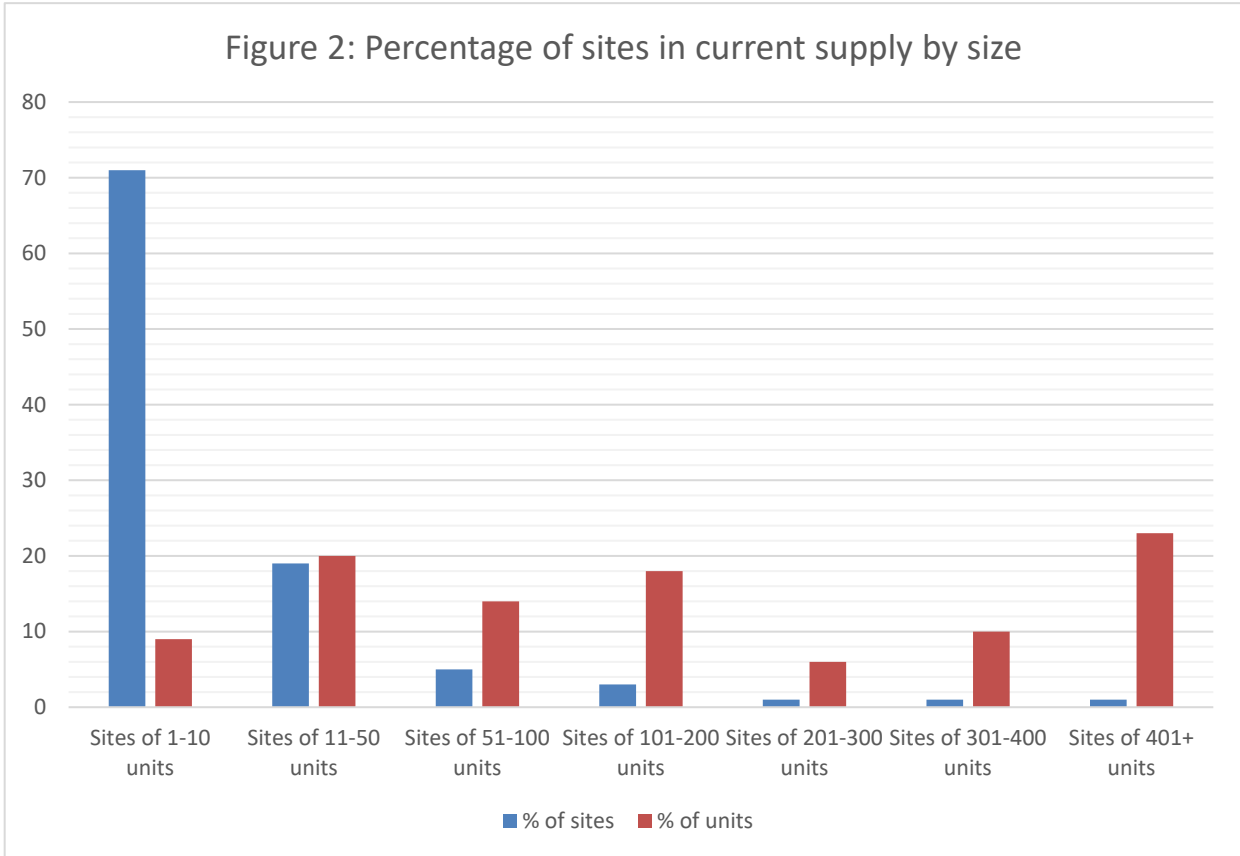
	Previously Developed Land		Greenfield Land		Total	
	No of Sites	No of Units	No of Sites	No of Units	No of Sites	No of Units
Allocated Sites	33	3286	0	0	33	3286
Sites with PP	281	4015	4	215	285	4230
Other identified capacity	4	164	2	57	6	221
Total	318	7465	6	272	324	7736
%	98.1%	96.5%	1.9%	3.5%		

7.5 Table 4 sets out the supply of new build sites by size of site. It shows that there is a 'spread' of site sizes which should allow for a variety of developers to be involved in the delivery of homes, i.e. SMEs, volume housebuilders and housing associations.

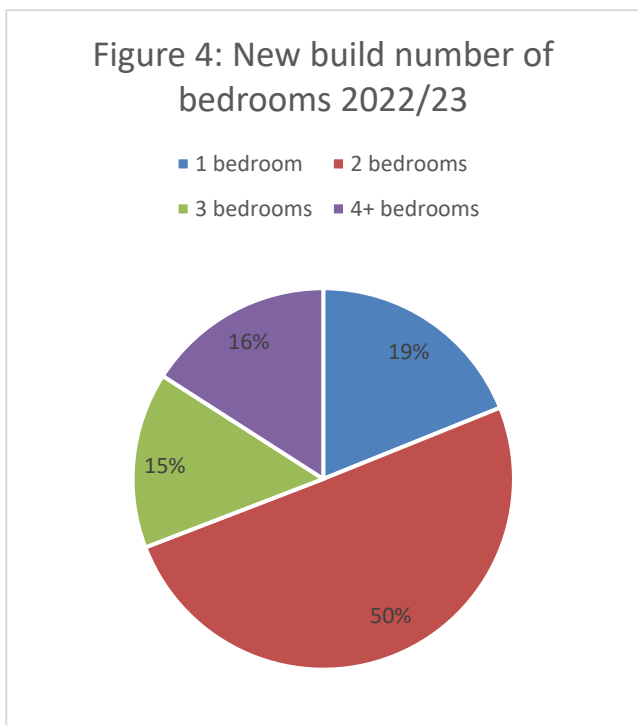
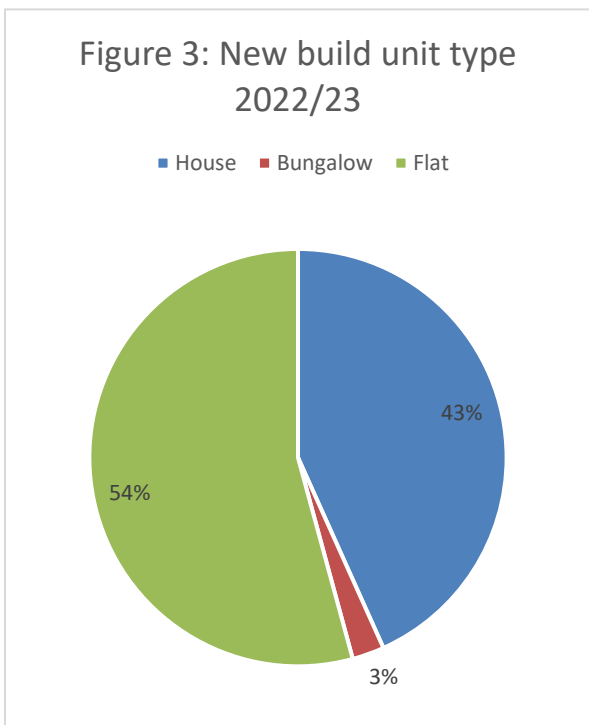
Table 4: Current supply by size of site (adapted from SHLAA 2022)

	Sites of 1-10 units		Sites of 11-50 units		Sites of 51-100 units		Sites of 101-200 units		Sites of 201-300 units		Sites of 301-400 units		Sites of 401+ units		Total no of sites	Total no of units
	No of sites	No of units	No of sites	No of units	No of sites	No of units	No of sites	No of units	No of sites	No of units	No of sites	No of units	No of sites	No of units		
Allocated Sites	1	7	16	463	7	460	6	807	0	0	1	400	2	1148	33	3286
Sites with Planning Permission	230	696	40	940	7	533	4	586	2	457	1	392	1	626	285	4230
Other identified capacity	0	0	5	151	1	70	0	0	0	0	0	0	0	0	6	221
Total	231	703	61	1554	15	1063	10	1393	2	457	2	792	3	1774	324	7736
%	71%	9%	19%	20%	5%	14%	3%	18%	1%	6%	1%	10%	1%	23%		

7.6 Figure 2 shows that Sandwell has many small sites. However, they provide for less than 10% of the supply of land for homes. It also demonstrates that there is a mix of sizes of sites especially with capacity ranging between 11 – 200 units and above 400 units.



7.7 Charts 3 and 4 show a good mix of types of dwellings with nearly half of the 201 new build homes completed last year being houses / bungalows. There was a range in the number of bedrooms built with two bed homes making up for half of all completions.

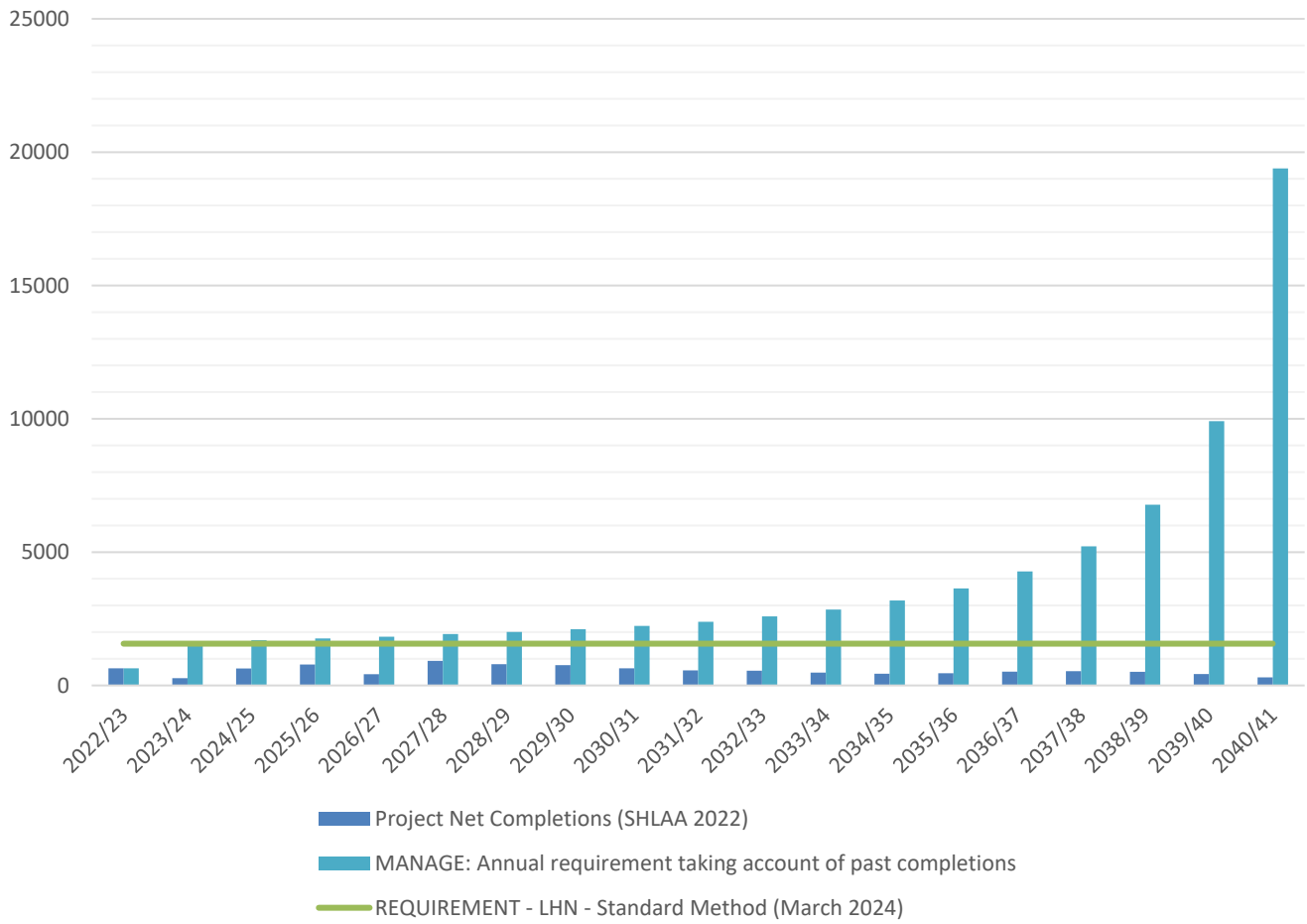


- 7.8 Table 5 and Figure 5 set out the completions that have occurred up to 2022/23. It also estimates what the supply will be up to 2041. The supply figures are taken from the Strategic Housing Land Availability Assessment (SHLAA) 2022, which identifies sites that are suitable, available and deliverable for housing up to 2026 in line with the plan period in the BCCS and how far supply will meet 10 and 15-year housing need figures using the standard method.
- 7.9 It demonstrates that to meet the target in the BCCS the net completions will have to be more than double the completions delivered annually in the past 10 years.

Table 5: Projected completions and housing need

Year	Project Net Completions (SHLAA 2022)	REQUIREMENT - Phased Target in Core Strategy (2011)	REQUIREMENT - LHN - Standard Method (March 2024)	Cumulative net LHN - Standard Method (March 2024)	Cumulative Project Net Completions	MONITOR - Cumulative LHN and Completions	MANAGE: Annual requirement taking account of past completions
2022/23	642	1876	1567	1567	642	-925	642
2023/24	272	1876	1567	3134	914	-2220	1618
2024/25	639	1876	1567	4701	1553	-3148	1698
2025/26	786	-	1567	6268	2339	-3929	1764
2026/27	423	-	1567	7835	2762	-5073	1829
2027/28	922	-	1567	9402	3684	-5718	1929
2028/29	797	-	1567	10969	4481	-6488	2007
2029/30	764	-	1567	12536	5245	-7291	2108
2030/31	642	-	1567	14103	5887	-8216	2230
2031/32	566	-	1567	15670	6453	-9217	2389
2032/33	555	-	1567	17237	7008	-10229	2591
2033/34	479	-	1567	18804	7487	-11317	2846
2034/35	442	-	1567	20371	7929	-12442	3184
2035/36	458	-	1567	21938	8387	-13551	3641
2036/37	516	-	1567	23505	8903	-14602	4277
2037/38	537	-	1567	25072	9440	-15632	5218
2038/39	512	-	1567	26639	9952	-16687	6778
2039/40	430	-	1567	28206	10382	-17824	9911
2040/41	304	-	1567	29773	10686	-19087	19391

Figure 5: Sandwell Housing Trajectory 2022/23



8.0 Planning Applications

8.1 The Government sets targets for how many planning applications should be determined in specific time periods. They are 60% of major applications to be determined in 13 weeks, 70% of minor applications to be determined in 8 weeks and 80% of other applications to be determined in 8 weeks.

8.2 Sandwell's planning service has consistently continued to exceed these performance targets throughout 2022 and 2023, as shown below. The on-going commitment of all staff, coupled with the assistance of Planning Committee, has very much helped to achieve this.

8.3 In 2021-22 Sandwell Council's performance was:

- 53 major applications were received with 48 determined in 13 weeks, **90.6%**;
- 270 minor applications were received with 224 determined in 8 weeks, **83.0%**; and
- 901 other applications were received with 816 determined in 8 weeks, **90.6%**.

In 2022-23 Sandwell Council's performance was:

- 45 major applications were received with 41 determined in 13 weeks, **91.1%**;
- 310 minor applications were received with 285 determined in 8 weeks, **91.9%**; and
- 814 other applications were received with 735 determined in 8 weeks, **90.3%**.

8.4 Table 6 sets out the total number of planning applications received and determined, and the percentage approved and refused in the last three years.

Table 6: Applications received and determined

	2021/22	2022/23	2023/24
Number of applications received	1262	1153	969
Total number of applications determined	1224	1169*	938
Number of applications determined under delegated powers	1164 (95%)	1124 (96%)	892 (95%)
Of the applications determined			
Applications approved	1113 (91%)	1058 (91%)	845 (90%)
Applications refused	111 (9%)	111 (9%)	93 (10%)

*this number is larger as the council determined applications in this period that were carried over from previous months

8.5 To help speed up the application process developers are also advised to submit viability reports and draft heads of terms when an application is submitted. This requirement is detailed in the council's [Validation Checklist](#) (updated September 2023).

9.0 Housing Supply Strategic Sites

- 9.1 The SHLAA 2022 sets out that there is total housing capacity of 8,749 homes net. This total includes capacity from identified sites and small windfall sites. A further 1,937 housing capacity is available and captured in the draft Sandwell Local Plan from potential additional sources including density uplift, aspirational growth in regeneration areas and surplus floorspace in West Bromwich Strategic Centre and other Town Centres. The following table looks at the strategic sites in the borough (sites of 100 homes or more). Table 8 highlights the issues and challenges facing the strategic sites, what actions have been taken to date and what further action is needed.
- 9.2 A review of Black Country Core Strategy and the Site Allocations and Delivery DPD began in 2017. The review assessed all residential and employment allocations to determine whether they are still developable, deliverable and available. In the early stages of the review, information came forward for certain existing employment sites which meant they are no longer considered to be developable for residential due to the current occupiers investing significantly in their sites to expand their businesses. Therefore, even though they are allocated for residential purposes, there is no longer any prospect of them coming forward for residential use.
- 9.3 During 2019 and 2020, further detailed evidence was progressed to support the Black Country Plan review in the form of the Black Country EDNA Stage 2 and the Black Country Employment Area Review (BEAR). This work provides a comprehensive review of the quality and long term sustainability of the Black Country's employment areas for continued employment use and the extent to which occupied employment sites currently allocated for housing should continue to be allocated for redevelopment in the emerging Sandwell Local Plan.
- 9.4 The overall effect of the EDNA and BEARs work is to recommend that the homes which are currently allocated in Sandwell on occupied employment land should be reduced by some 7290 homes. This new evidence has immediate implications for the suitability and developability of specific housing allocation sites. National planning guidance expects all available evidence to be taken into account when determining the list of sites suitable and developable for housing through the SHLAA process. This reduction was reflected in the 2020 SHLAA, with a detailed justification taken from the BEAR work provided for each site as part of the deliverability commentary.

Table 8: Progress made on Strategic Sites

Site Ref	Site address	Site capacity	Planning and delivery status	Key issues, challenges and barriers	2021 update	2022 update	2024 update	Actions
2985	Friar Park Urban Village, Friar Park Road, Wednesbury	630	Approved Local Plan allocation Draft SLP allocation	Severe ground contamination	Consultants commissioned and Project Team established	Masterplan has been drafted and is out for consultation Nov – Dec 2022	Masterplan has been endorsed by Cabinet. Additional £11.5m funding secured from Wednesbury Levelling Up Partnership	Launch developer expression of interest exercise and undertake developer procurement.

6999	Brandhall Golf Course, Oldbury	190	Outline consent Draft SLP allocation	Community consultation	Consultants commissioned and Project Team established. Consultation on options to be undertaken November 2021 with a preferred option early 2022.	16 th Nov Cabinet approved recommendation for a park, school and 190 homes	Outline planning permission granted for park, school and 190 homes (DC/23/68540)	Appoint consultancy to develop proposals for housing and park design
2371	North Smethwick Canalside / Rolfe Street Masterplan	688	Approved Local Plan allocation Draft SLP allocation	Relocating businesses, heritage impact, building demolition and ground remediation	Consultants commissioned to prepare Smethwick to Birmingham Corridor Framework and consultation undertaken during October and November 2021.	Corridor Framework approved by Cabinet February 2022 and a wider Masterplan for the Rolfe Street area commissioned September 2022.	Rolfe Street Masterplan endorsed. Funding secured to prepare land for redevelopment from Government's Towns Fund.	Secure approval to demolish relevant buildings and prepare land for redevelopment.
2940	Rattlechain Land to north of Temple Way, Tividale	518	Approved Local Plan allocation Draft SLP allocation	Severe ground contamination due to former Albright & Wilson chemical lagoon/tip and a large mound of foundry sand from Mintworth Transport. Various land ownerships	Site has been carried forward as a housing site in the draft Black Country Plan	Site allocated in Reg 18 BCP	Site allocated in Reg 18 SLP. Officers in discussion with main landowner about how to assist in bringing site forward.	Work with landowners to identify funding opportunities to assist with remediating site.
3507	Edwin Richards	626	Reserved	Phasing due to	Site has been	Site allocated in	Site allocated in	Work with

	Quarry, Portway Road, Rowley Regis		Matters approval for 278 dwellings Draft SLP allocation for 526 dwellings (further 100 beyond plan period)	ongoing landfill operations at former quarry. SLINC and Strategic Open Space designations.	carried forward as a housing site in the Black Country Plan.	Reg 18 BCP.	Reg 18 SLP. Reserved Matters for 278 dwellings approved 21 December 2023 ref. DC/23/67924	landowner to assist bringing development forward on the site.
7075	Land between and rear of 56-80 Hall Green Road, West Bromwich	223	Reserved Matters approval	Site has significant chemical contamination	Site not started.	Work commenced in March 2022.	Site mostly built out.	No action required.
2370	Bradleys Lane / High Street, Tipton	189	Approved Local Plan allocation Draft SLP allocation	Relocation of smelting works	Site has been put forward for housing in the Draft Black Country Plan	Site allocated in Reg 18 BCP	Site allocated in Reg 18 SLP	Support business relocation
2388	Swan Lane North of A41 West Bromwich	147	Approved Local Plan allocation Draft SLP allocation	Former gas works with some remaining infrastructure on site.	Land owner still showing interest. Site has been proposed for housing in the Draft Black Country Plan.	Planning application DC/22/66532 for 147 dwellings submitted pending decision. Circa. £8m funding secured from BCLEP and Homes England.	Planning application DC/22/66532 granted 20/12/2022. Matrix Housing Partnership commenced work on site January 2024.	No action required.
6441 6442	West Bromwich Masterplan sites (Cultural Quarter, Queens Square Living, West Bromwich Central, George	1,118	Approved mixed use allocation in Local Plan Identified in West Bromwich	Land ownership, site assembly, building demolitions and site preparation work.	West Bromwich Masterplan and Interim Planning Statement being prepared.	West Bromwich Masterplan and Interim Planning Statement approved February 2022. Money secured	Work to acquire interests in Queen's Square site by negotiation is ongoing. Brownfield Land	Procure strategic development partner. Acquire interests in Queen's Square site. Dispose of

	Street Living)		Masterplan Draft SLP allocation			through Towns Fund to assist with site acquisition.	Release Funding secured to assist Black Country Housing Group delivery of 26 apartments in Cultural Quarter	Former Gas Showrooms (Cultural Quarter) to Black Country Housing Group
7049	Fountain Lane, Oldbury	234	Full planning consent	Severe ground contamination	Planning application DC/20/64152 for 234 dwellings approved 10/02/2021	£4m funding secured from WMCA Remediation Fund. Building work has commenced.	Scheme expected to complete by late 2024.	No action required.
6924	Pheonix Collegiate, Friar Park	105	Outline planning consent Revised full planning application under determination	Relocation of sports pitches.	Outline planning application DC/20/63911 for 84 dwellings under determination	Outline planning application DC/20/63911 for 84 dwellings granted 28/10/2022.	Revised full planning application DC/23/68742 for 105 dwellings under determination.	Determine planning application DC/23/68742
6919	Grove Lane / Cranford Street / London Street, Smethwick	500	Approved Local Plan allocation Draft SLP allocation	Land ownership and site assembly, building demolition and site preparation works	Work to prepare Grove Lane Masterplan and Smethwick to Birmingham Corridor Framework ongoing.	Grove Lane Masterplan approved February 2022. Funding secured through Government's Towns Fund to progress site acquisition and remediation at Grove Lane. Cabinet	Planning permission DC/22/67165 for 392 apartments granted 30/06/2023. £18m funding made available through Government's Levelling Up Fund to assist	Progress site acquisition and remediation work.

						approval to progress CPO secured 16/11/2022.	site acquisition at Grove Lane.	
1546	Cranford Street / Heath Street / Canal, Smethwick	115	Approved Local Plan allocation Draft SLP allocation	Land ownership and site assembly, building demolition and site preparation works	Work to prepare Grove Lane Masterplan and Smethwick to Birmingham Corridor Framework ongoing.	Grove Lane Masterplan approved February 2022.	No update	Support business relocation and regeneration of site
2590	Cape Arm, Cranford Street, Smethwick	170	Approved Local Plan allocation Draft SLP allocation	Land ownership and site assembly, building demolition and site preparation works	Work to prepare Grove Lane Masterplan and Smethwick to Birmingham Corridor Framework ongoing.	Grove Lane Masterplan approved February 2022.	Site currently occupied by NHS via lease for construction of Midland Metropolitan University Hospital.	Progress site acquisition
7196	Abberley Street, Smethwick	140	Approved Local Plan allocation Draft SLP allocation	Building demolition and site preparation works	Site acquired by WMCA. Work to prepare Grove Lane Masterplan and Smethwick to Birmingham Corridor Framework ongoing.	WMCA working with a Housing Association Partnership to bring the site forward for affordable housing. Grove Lane Masterplan approved February 2022.	WMCA Investment Board approved in principle to explore freehold disposal of site to affordable housing developer on 12/02/2024	Work with future developer to secure planning permission for site.
3040	Woods Lane, Cradley Heath	196	Approved Local Plan allocation	Land ownership and site assembly,	No update	Planning permission DC/21/66444 for	Construction work underway for 34 dwellings	Dispose of council owned land at former

			Draft SLP allocation	building preparation, site levels and site preparation work		34 dwellings granted 9/9/2022	approved under permission DC/21/66444	Smouts site to housing developer Support interested developers to acquire land for redevelopment.
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9.5 Table 8 focusses on strategic sites, however there are a range of sites within the remaining supply identified in the SHLAA that are not strategic (have a capacity of less than 100 units). These sites experience similar issues that have resulted in them not being developed, namely ground conditions and the cost of remediating the land and relocation of existing businesses.

9.6 The Council has applied to various funds to secure money to acquire and remediate land to assist with the delivery of new homes. Table 9 sets out where funds have been secured for 2022-2023 which relate to housing. Some awards, such as the Towns Fund, relate only in part to housing.

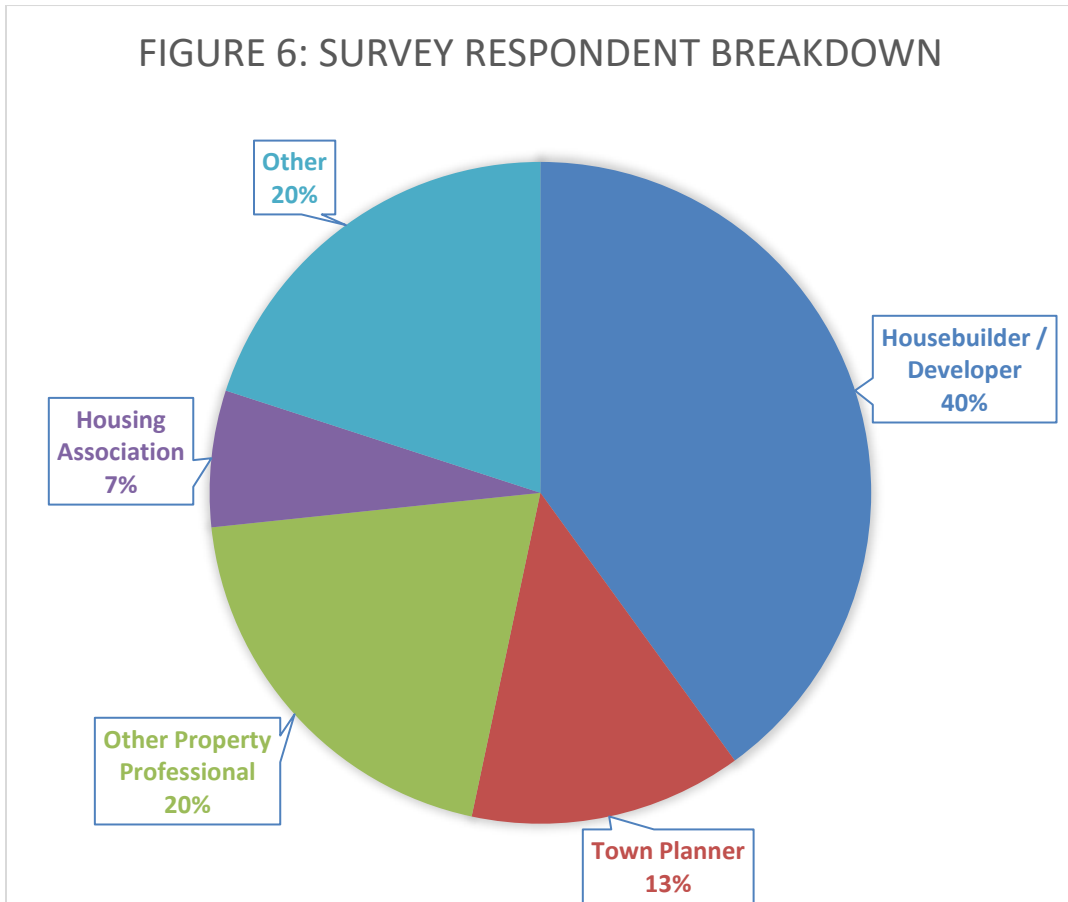
Table 9: Funding secured by Sandwell Council 2022-23

Funding source	Award	Date	How secured
Towns Fund Programme	£67.5m	May 2022	16 Treasury standard Green Book Business Cases submitted and approved by DLUHC
Tipton Town Centre Regeneration	£20m	March 2023	Business Case submitted and approved by DLUHC as part of competitive process
Social Housing Decarbonisation Funds (SHDF 1 and 2; LAD and HUG)	£12.82m	2022/23	Various bids submitted in 2022 and 2023 as part of national competitive exercise – multiple awards
OPE Funding for Brownfield Remediation	£1.37m	August 2023	Competitive bidding process at national level via WMCA – only one of two LA's in West Midlands successful.
Wednesbury Levelling Up Partnership	£20.3m	2023	Negotiation about priorities and overall package with DLUHC civil servants after national announcement of 20 LA's selected for LUP
Long Term Plan for Towns (Smethwick)	£20m	October 2023	PM announcement at Conservative Party Conference
Grove Lane (Smethwick) Levelling Up Fund	£18m	November 2023	Business Case submitted and approved by DLUHC as part of competitive process
Approximate total	£160m	2022/23	

10.0 Industry engagement

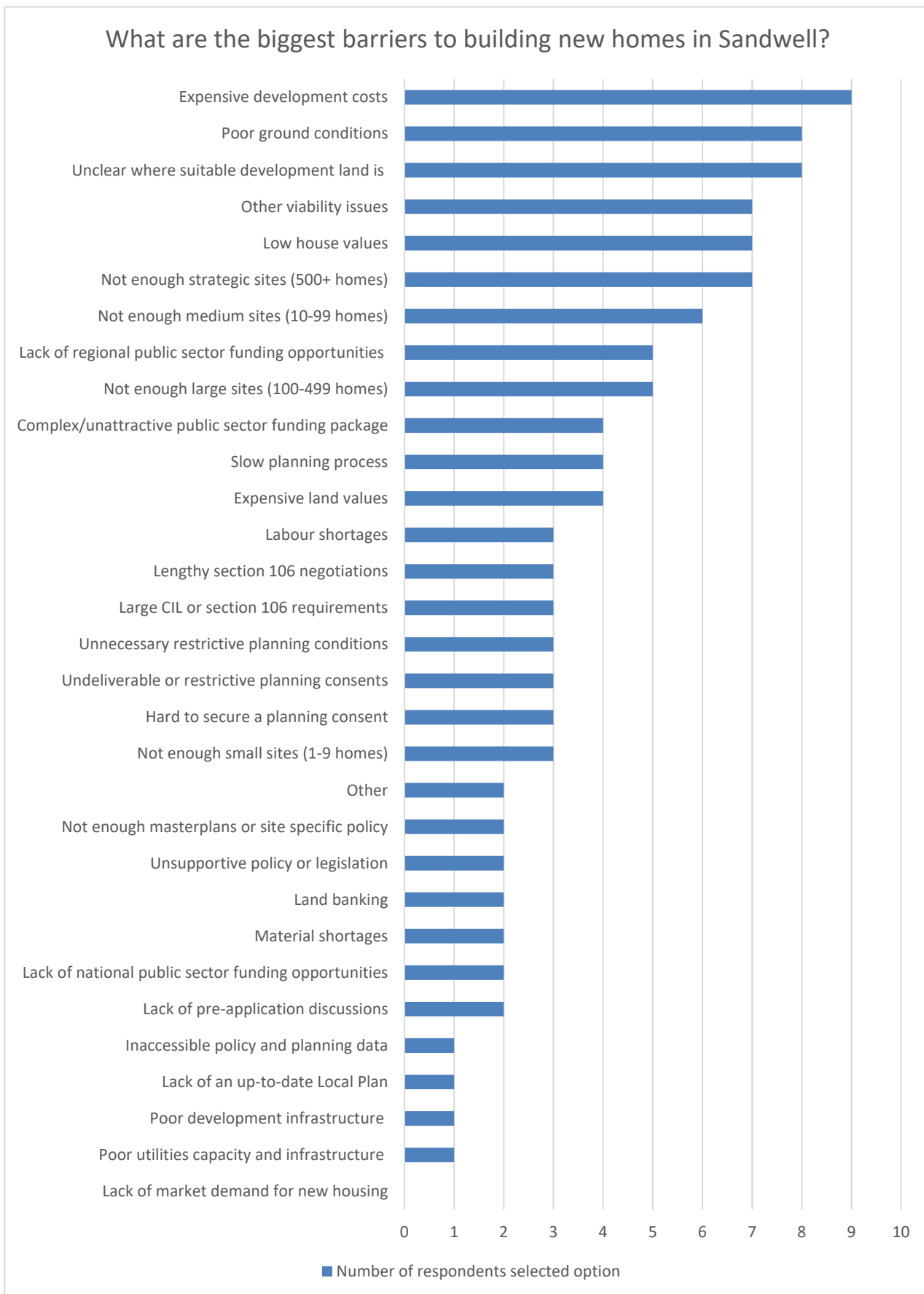
10.1 In January – February 2024, officers contacted known developers, housebuilders, their agents, and other property professionals operating in the borough to request that they complete an online survey seeking views on the barriers to house building in Sandwell. 15 respondents completed the survey.

FIGURE 6: SURVEY RESPONDENT BREAKDOWN



10.2 The survey included a long list of options that were suggested could be impacting the delivery of new homes in the borough. Respondents were asked to select all the options that in their professional opinion are acting as a barrier to building new homes.

Table 10: Barriers to building new homes



10.3 Respondents were invited to suggest additional reasons why housing delivery is behind target, and to recommend what the council could do to support delivery.

Land costs and viability

- There is no incentive to release land. Employment land, even poor quality employment land, is worth more than residential development sites. Therefore land, even when allocated for residential development, is almost always worth more in its current use. Residential development offers a one-off payment to current landowner whereas current use retains a lasting income. [three respondents]
- Unrealistic landowner aspirations as to land value which do not take account of abnormal ground conditions, probably at least in part due to recognition of potential for grant funding. [two respondents]
- Land is expensive and hard to find, and values are so low that developers cannot get sufficient return to be able to build.
- Additional requirements like securing Biodiversity Net Gain are impacting viability even further.
- Long and expensive remediation programmes are required to deliver sites in Sandwell.
- The delivery of private apartments of any quality is particularly constrained. Often higher density equates to greater viability issues. This leads to a planning conundrum where greater site unit numbers might be sought to increase housing delivery but this will often lead to greater viability issues.

Land ownership

- Potential sites are often in fragmented and multiple ownerships and difficult to bring together without land assembly or CPO from the public sector. [four respondents]

Securing funding

- Sites require significant gap funding to bring forward. Costs associated with preparing and managing an outline planning application run into the hundreds of thousands of pounds, and is carried out at risk if there is no certainty of gap funding or planning consent likely to be forthcoming.
- Lack of funding to SMBC from WMCA to bring forward large-scale regeneration projects including heritage assets and to address wider issues including ownership and infrastructure.
- The cost of addressing abnormal costs often exceed intervention levels for grants.
- Funding process should be faster as developers need to move quickly once a site is purchased.
- Issue with the availability and requirements of funding packages, for example this is an issue as the Homes England programme comes to the end of its cycle and funding needs to be spent by a specific date.
- Certain sites cannot be unlocked without large pots of funding. Affordable housing can rarely be delivered without the assistance of grant money.
- Grant funding requests we review on behalf of funding bodies are often poorly informed.

Public perception

- Council officers and local people do not understand local housing need and seem to claim developers are being greedy and trying to over-develop sites. [two respondents]
- Local neighbour objections carry a disproportionate amount of weight in the overall planning balance when these sites do come forward. Greater consideration should be given to the significant housing shortfall rather than the issues of one or two neighbours to a site

Planning policy, land availability and identification of suitable sites

- Land availability is constrained. A balance between meeting employment and housing need must be struck. [two respondents]
- Not enough land is available to deliver the housing required. [two respondents]
- Slow plan making process. Green Belt land needs to be released and Sandwell is not getting enough support from other authorities that could assist. [two respondents]
- Absence of a regional approach now that the Black Country Plan has fallen away.
- Sites may be allocated for residential development within a local plan without a proper and thorough review of ground conditions and the associated viability issues which then ensue.

Development management

- The planning process is slow, often because consultees take a long time to respond or don't respond at all. [two respondents]
- Pre-application fees are a blocker to early engagement.
- Joint meetings are required on difficult sites including representation from planners, housing strategy and estate teams so a co-ordinated plan can be put together to aid site delivery.

Table 11: Suggested additional factors slowing housing delivery

Table 12: Suggestions for council action

Land assembly and remediation

- Identify brownfield sites and support partners to bring these sites forward with particular assistance around land assembly and remediation. [seven respondents]
- Use Joint Ventures and partnership working to help strategic sites come forward. [four respondents]
- Make more land available for development, including council owned land. [two respondents]
- Be more proactive and supportive in helping housing sites come forward, with lead officers from the council assigned to help bring sites forward. [two respondents]
- Support community groups to identify appropriate sites and build their own homes.
- Use Government funding for land reclamation and remediation.
- The issue is also about place-making, meeting the needs of the community and providing amenities.

Development Management

- Speed up the planning process, particularly for the discharge of pre-commencement conditions, and be accountable for not meeting timescales provided by the council. [two respondents]
- Do not impose overbearing conditions or require discharge prior to commencement unnecessarily.
- Reduction or removal of S106 requirements and other contributions to help facilitate viability.
- CIL is already at a reasonably low level but does potentially reduce S106 contributions.
- Be more flexible and consider alternative design solutions like communal garden space, higher densities and shared highways where this is justified.
- Make it simpler to obtain planning approval with planning officers available to provide advice.

Funding and partnerships

- Provide more financial support, including site feasibility funding. [three respondents]
- Signpost applicants to appropriate grant or loan funding to unlock sites and support delivery. [two respondents]
- Lobby Government via Cabinet for more funding.
- Offer targeted WMCA funding including covering costs incurred in enforcing repair orders on the owners of heritage buildings to support their reuse.
- Work with WMCA and other funding partners to ensure funding remains available and accessible.
- Provide a revolving loan fund for SME developers for the Black Country.

Planning Policy

- Identify new allocations in the local plan which are thoroughly assessed for deliverability.
- Pressure neighbouring authorities to persuade them to choose to release land to help meet Sandwell's unmet need.
- Regularly publish evidence on housing needs assessment by house type, size and tenure to aid investment decisions.
- Give more confidence on development opportunities though site/area specific policy.

Perceptions and attitudes

- Inform residents and Councillors about housing need and reframe language so that developers are not seen as the 'enemy' but are partners in building new homes. [two respondents]
- Officers should have confidence to overrule objectors where housing demand is pressing.
- The planning teams at SMBC should offer consistent advice as there can be different views from different officers.
- Increase officer awareness about the risks for landowners/developers of securing planning consent, as a single consultee can delay or halt an entire regeneration scheme causing significant additional costs.

Council housing

- More housing should be delivered by the Council and registered social providers. [two respondents]

11 Summary

- 11.0 The main barriers to creating and maintaining a robust supply of housing land in Sandwell are 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.
- 11.1 Given the increase in demand for employment land and sites, which was not anticipated when the last strategic planning assessments were carried out for both the Black Country in general and Sandwell in particular, the supply of brownfield land that might otherwise have come forward to meet local and wider housing needs has not materialised. This reflects the health of the local economy.
- 11.2 The Council is actively seeking to identify as much housing land supply as possible through work on the emerging Sandwell Local Plan. This includes taking a proactive role in increasing housing delivery within regeneration areas and working with Birmingham and the other Black Country authorities towards more strategic allocations across the Housing Market Area.

12.0 Actions

Table 13: Actions

Outcome – Increase housing land supply and awareness of sites					
Actions	Success	Timetable	Priority	Status	Department / owner
Council surplus assets					
Action 1: Review asset site register for borough	Complete	2022/2023	High	Complete – 137 surplus assets identified	Assets and Land
Action 2: Appoint consultancy to review development potential of surplus assets and recommend disposal method	Complete	2023/2024	High	Complete - Avison Young appointed. Four significant development sites and a number of small sites advised to be suitable for disposal for residential development	Assets and Land
Action 3: Seek Cabinet authority to dispose of assets	Not started	Summer 2024	High	Not started – report expected to be presented to Cabinet in summer 2024	Assets and Land
Action 4: Complete disposal process	Not started	2024/2025	High	Not started	Assets and Land
Land assembly					
Action 1: Acquire and remediate 3.45ha of industrial land at Grove Lane, Smethwick, for future residential development and a	Ongoing	2022-2026	High	Ongoing – Cabinet approval secured in March 2024 to accept £18m Levelling Up Fund to facilitate project	Regeneration

new school					
Action 2: Demolish buildings and remediate council-owned land at Rolfe Street, Smethwick, to assist with delivery of Rolfe Street Masterplan	Ongoing	2023-2025	High	Ongoing – funding secured to undertake technical studies of Rolfe Street Baths site. Discussions ongoing with Historic England about building retention/demolition at Rolfe Street Enterprise Centre	Regeneration
Digital Planning					
Action 1: Secure funding from Digital Planning Improvement Fund and join Open Digital Planning Community	Complete	2023/2024	Medium	Complete - £100,000 secured through Digital Planning Improvement Fund and council has joined Open Digital Planning Community	Planning Policy
Action 2: Complete Digital Planning Maturity Assessment and prepare Action Plan for digitising planning service	Ongoing	2024	High	Ongoing	Planning Policy Development Management Regeneration Planning Systems and Support
Action 3: Publish planning datasets to national Planning Data Platform	Ongoing	2024	High	Ongoing – TPOs, Article 4s, Listed Buildings and Conservation Area datasets to be published	Planning Policy Planning Systems and Support
Action 4: Digitise SHLAA map and Brownfield Land Register	Not started	2024/25	Medium	Not started	Planning Policy
Site specific policy and guidance					
Action 1: Produce Interim Planning Statement and Masterplan for West Bromwich which identifies land for new homes	Complete	2021/2022	High	Complete – Interim Planning Statement and Masterplan adopted February 2022 which identifies land for 1,359 new homes.	Regeneration and Planning Policy
Action 2: Produce Smethwick to	Complete	2021/2022	High	Complete – Corridor Framework and	Regeneration

Birmingham Corridor Framework and Grove Lane Masterplan which identify land for new homes				Masterplan prepared with Birmingham City Council and adopted February 2022. Masterplan straddles Sandwell and Birmingham and identifies land for around 800 new homes	
Action 3: Produce Rolfe Street Masterplan which identifies land for new homes	Complete	2022/2023	High	Complete – Masterplan falls within Smethwick to Birmingham Corridor Framework. It was approved in June 2023 and identifies land for 688 new homes	Regeneration
Action 4: Produce Development Framework for Carters Green which identifies land for new homes	Complete	2022/2023	Medium	Complete – Development Framework included within draft Sandwell Local Plan and identifies land for 308 new homes	Regeneration
Action 5: Produce Friar Park Urban Village Masterplan which identifies land for new homes	Complete	2022/2023	High	Complete – Masterplan endorsed March 2023 which identifies land for 630 new homes	Regeneration
Action 6: Produce Wednesbury Masterplan which identifies land for new homes	Ongoing	Summer 2024	High	Ongoing – expected to be complete summer 2024	Regeneration
Outcome – Attract inward investment and support housebuilders					
Actions	Success	Timetable	Priority	Status	Department / owner
Secure funding to support development of sites					
Action 1: Secure funds to acquire and remediate 3.45ha of industrial land at Grove Lane, Smethwick, for future residential development and a new school	Complete	2023/2024	High	Complete – Cabinet approval secured in March 2024 to accept £18m Levelling Up Fund to facilitate project	Regeneration

Action 2: Secure funds to deliver new council homes in Tipton	Complete	2022/2023	High	Complete – HMG 2023 Spring Budget announced £20m to deliver 65 new affordable homes in Tipton. Cabinet approval to agree scope of project secured in October 2023.	Regeneration
Action 3: Secure funding to deliver Friar Park Urban Village, Wednesbury	Ongoing	2024/25	High	Ongoing – funding secured from various sources including £11.5m from Levelling Up Partnership	Regeneration
Action 4: Secure funds to assist with the release of council-owned land for housing	Complete	2023/2024	High	Complete - £1.37m secured from Brownfield Land Release Fund to assist with release of three council-owned sites for housing	Regeneration
Action 5: Develop a Place Based Strategy which will set out how the council intends to access and direct funding from the West Midlands Combined Authority's Single Settlement from HMG	Ongoing	2024/2025	High	Ongoing – work to prepare Place Based Strategy has commenced	Regeneration Planning Policy
Action 6: Work with Homes England to increase the agency's activity within the borough	Not started	2024/2025	High	Not started	Regeneration
Use partnership working to support housebuilding					
Action 1: Form Joint Venture partnership with WMCA to bring forward development at Friar Park Urban Village, Wednesbury	Ongoing	2024-2026	High	Ongoing – Sandwell Council and WMCA working in Joint Venture partnership to bring forward development	Regeneration
Action 2: Agree Delivery Strategy for Brandhall Golf	Ongoing	2023/2024	High	Ongoing – soft market testing to determine appropriate disposal	Regeneration

Course				mechanism and procurement route undertaken in late 2023. Proposed Delivery Strategy expected to be presented to Cabinet in Summer 2024.	
Promote development opportunities in the borough					
Action 1: Launch Regenerating Sandwell website to promote regeneration projects in the borough	Complete	2022/2023	High	Complete – Website launched and updated regularly	Regeneration
Action 2: Promote residential development sites at investment events (e.g. MIPIM, UKREiiF)	Ongoing	2023/2024	High	Ongoing – Borough opportunities promoted at MIPIM 2023 and expected to be promoted at UKREiiF 2024.	Regeneration
Outcome – Produce a new Local Plan for Sandwell with sufficient land for new homes					
Actions	Success	Timetable	Priority	Status	Department / owner
Sandwell Local Plan					
Action 1: Consult on Issues and Options	Complete	Q1 2023	High	Complete	Planning Policy
Action 2: Carry out a 'Call for Sites'	Complete	Q1 2023	High	Complete	Planning Policy
Action 3: Consult on Draft Sandwell Local Plan (Reg 18)	Complete	Q4 2023	High	Complete	Planning Policy
Action 4: Consult on Submission Sandwell Local Plan (Reg19)	Not started	Q3 2024	High	Not started	Planning Policy
Action 5: Submission to SoS	Not started	Q4 2024	High	Not started	Planning Policy
Action 5: Examination by SoS	Not started	Q1-Q4 2025	High	Not started	Planning Policy
Action 6: Adopt new Local Plan	Not started	2025/2026	High	Not started	Planning Policy
Action 7: Ensure SLP meets the soundness test of being 'positively	Ongoing	2024/2025	High	Ongoing – Sandwell Council is engaging with all local authorities in the	Planning Policy

prepared' and supported by agreements with other authorities to distribute Sandwell's unmet housing need				Housing Market Area as part of its duty to cooperate. An offer to accommodate some of Sandwell's and/or the Black Country's unmet need has been made from South Staffordshire	
Action 8: Viability testing of sites to ensure SLP meets the soundness test of being 'effective' and deliverable over the plan period	Ongoing	2024/2025	High	Ongoing – Aspinall Verdi appointed to undertake viability assessment of the SLP	Planning Policy
Action 9: Published updated Strategic Housing Market Assessment (SHMA) to inform allocations and policies in the SLP.	Not started	2024	High	Ongoing – SHMA update has been commissioned and is expected to be published summer 2024	Planning Policy
Outcome – Increase council housebuilding					
Actions	Success	Timetable	Priority	Status	Department / owner
Council house programme					
Action 1: Start work building 46 homes and complete work on 47 homes in 2022/23	Complete	2022/2023	High	Complete Start on site 22/23 – 46 units Completions 22/23 was 47 units	Housing and Partnerships
Action 2: Start work building 62 homes and complete work on at least 15 homes in 2023/24	Ongoing	2023/2024	High	Ongoing Start on site 23/24 – 62 Completions 23/24 - tbd	Housing and Partnerships
Action 3: Start work building 54 homes and complete work on at least 81 homes in 2024/25	Not started	2024/2025	High	Not started	Housing and Partnerships
Action 4: Start work building 18 homes and complete work on at least 26 homes	Not started	2025/2026	High	Not started	Housing and Partnerships

in 2025/26					
Action 5: Secure Cabinet approval to develop former Langley Baths site for housing	Not started	2024/2025	High	Not started	Housing and Partnerships
Action 6: Tender for construction works for Coppice Street (12 units), Garratt's Lane (20 units), Railway Street (10 units), Harvest Road (8 units)	Not started	2024/2025	High	Not started	Housing and Partnerships
Council-owned housing company					
Action: Investigate establishing a council-owned housebuilding company		N/A		Abandoned - Cabinet decided on 21/06/2023 to not proceed with the establishment of a Council owned Housing Company at this time in accordance with officer recommendation (item 69/23 refers). The decision was made as the initial business model developed by Savills indicated that commercial viability was marginal in June 2022 and the financial risk to the council had understood to have increased since this time.	Housing and Partnerships
Strategic development partner					
Action 1: Secure Cabinet approval to procure a Strategic Development Partner to assist with delivery of Regeneration Pipeline	Complete	Summer 2023	High	Complete – Cabinet approval secured 12 July 2023 (item 17/23 refers)	Regeneration Assets and Land
Action 2: Undertake soft market testing to gauge Strategic Development	Complete	2023/24	High	Complete – Interest expressed from market for Strategic Development Partner opportunity	Regeneration Assets and Land

Partner interest					
Action 3: Commence procurement process for Strategic Development Partner	Not started	2024	High	Not started	Regeneration Assets and Land
Action 4: Appoint Strategic Development Partner	Not started	2024/25	High	Not started	Regeneration Assets and Land
Outcome – Streamline determination process for planning applications					
Actions	Success	Timetable	Priority	Status	Department / owner
Planning applications					
Action 1: Improve determination timescales for the discharge of pre-commencement conditions, and review standard pre-commencement conditions so that conditions are only imposed on housing applications with prior commencement discharge if necessary	Ongoing	2024/25	High	Ongoing – standard conditions are regularly reviewed (e.g. removing electric vehicle charging and low emission boilers to avoid duplication with Building Regulations). Applicants are encouraged to submit information as part of planning submission to avoid the need for conditions, and are made of aware of circumstances where pre-commencement conditions are required.	Development Management
Action 2: Raise issue of slow response rate with statutory consultees so that they are aware of the knock-on consequences for determination timescales and housing delivery in the borough	Ongoing	2024/25	High	Ongoing – new process introduced whereby redacted statutory comments are published on council website as soon as received. Officers proactively chase responses where they are due and take a proportionate approach where no response is received.	Development Management