

From: Philippa Smith

Email: sandwell_localplan@sandwell.gov.uk

Date: 21st March 2025

The Planning Inspectorate
Room 3J, Kite Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

(FAO Inspector C Jack BSc (Hons) MA MA(TP) MRTPI)

Dear Mrs Jack,

Sandwell Local Plan – Council’s Response to IN1: Inspector’s Initial Queries for the Council

This letter and attached documents provide an additional response to your letter, IN1: Inspector’s Initial Queries for the Council, dated 27th January 2025 as follows:

Duty to Cooperate

What is the timetable for completing the Statements of Common Ground (SOCGs)

The Council is still working with neighbouring local authorities across the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) and the Black Country Functional Economic Market Area (BCFEMA) to sign SOCGs relating to housing and employment contributions. The latest position statement and two SoCGs accompanying this letter provide the latest position with regard to meeting unmet housing and employment need across the GBBCHMA and the BCFEMA.

Does the Council intend to submit any further SOCGs with other prescribed bodies or organisations? If so, please advise which and the likely timetable

The Council does not intend to submit any further SoCGs with other prescribed bodies or organisations.

The Housing and Employment Strategy and Housing Land Supply

Would the Council please prepare a detailed topic paper setting out an overview of the plan’s strategy for housing including the justification for the plan’s housing requirement figure, and a similar topic paper for employment

Attached are a number of topic papers that set out the Council’s strategy for housing. These include:

- Affordable Housing

Directorate of Place

Sandwell MBC, Sandwell Council House, Freeth Street, Oldbury, West Midlands. B69 3DE

www.sandwell.gov.uk

- Gypsy and Travellers
- Housing Topic Paper

The Council has also prepared a topic paper for Employment as requested. This topic paper accompanies this letter.

With reference to the NPPF requirements, can the plan demonstrate a five-year supply of specific, deliverable housing sites and, if so, is there a reasonable prospect of this being maintained through the plan period?

The council has recalculated the 5 year housing land supply as set out in the accompanying documents. This calculates a 5 year housing land supply against objectively assessed needs using the government's previous standard method with a 20% buffer.

To evidence this, the Housing Topic Paper should also include, or be accompanied by, the plan's "as anticipated at the point of adoption", five-year supply calculation and any additional, updated (in addition to appendix B of the Plan) housing trajectory evidence necessary to demonstrate it. Annex 1 to this letter provides an example format for collating the appropriate site by site information.

The 5 Year Housing Land Supply and associated housing trajectory evidence is contained within the Housing Topic Paper which accompanies this letter.

Flood Risk

Has the Council appropriately undertaken a full sequential test of the submitted plan and if necessary, applied the Exception Test in accordance with NPPF167?

The Council has undertaken a Sequential Test of the submitted plan and applied the Exception Test where it was found to be necessary. This is contained in appendix E of the Site Assessment report and accompanies this letter. Appendix E has been amended to reflect the recommendations of the Environment Agency as set out in their email of 20th February 2025 (attached).

Has a Level 2 SFRA now been carried out for each of the sites highlighted in the EA representation?

The EA also identified issues with the Level 2 SFRA report produced by the Council's consultants. Amendments have now been made to the report in line with the recommendations made by the EA. The amended level 2 report also accompanies this letter.

Has there been further engagement with the EA on this additional evidence and if so, what is the current position?

The Council entered into an agreement with the EA for them to review the Council's responses to their representations at Reg19. This includes the Sequential and Exception Tests and also an additional potential housing allocation the Council intend to submit as a main modification

Directorate of Place

Sandwell MBC, Sandwell Council House, Freeth Street, Oldbury, West Midlands. B69 3DE

www.sandwell.gov.uk

to the Plan. The EA responded with a number of issues and recommendations which the council has taken on board and amended the various documents accordingly. The EA is now happy with the Sequential and Exception tests (appendix E) and the Level 2 SFRA and has written to confirm that they will be withdrawing their objections to the Sandwell Local Plan. Their response accompanies this letter.

Is there a SOCG between the Council and the EA?

No, the EA has withdrawn their objections to the Plan. A SoCG is no longer required.

Transport Modelling – outstanding requirements and clarifications in relation to transport modelling, including the revised Black Country Transport Modelling Report (TRAN 001)

- 1. What is the latest position ?**
- 2. Is there a SOCG between the Council and NH?**

The Council has written to National Highways (NH) confirming that a Statement of Common Ground is not considered necessary, as in NH's email of 12th February they confirmed that they do not consider the outstanding matters set out in their Technical Note of 21st November 2024 to be matters that would affect the soundness of the SLP. The Council is also committed to continuing to work in partnership with NH, along with the other Black Country Authorities, to refine the mitigation measures proposed to support the SLP, and any further mitigations identified as work progresses.

The Council has also produced a Transportation Topic Paper that provides contextual background and commentary on the supporting evidence used in the approach taken in developing transport policies STR1, STR2, STR3, STR4, STR5, STR6, STR7, STR9 and STR10 of the Sandwell Local Plan.

Yours sincerely,



Philippa Smith

Project Manager – Sandwell Local Plan

Directorate of Place

Sandwell MBC, Sandwell Council House, Freeth Street, Oldbury, West Midlands. B69 3DE

www.sandwell.gov.uk