

**Matter 2 |
Vision, Objectives, Sandwell's Housing and
Employment Needs, and the Plan's Overall
Scale of Growth
Written statement**

**Sandwell Local Plan 2024-2041
Submitted for Examination**

Vulcan Property II Limited

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Preliminaries

Local authority

Sandwell Council

Local plan

Sandwell Local Plan 2024-2041

Written statement

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1. Introduction

- 1.1 Sevo Planning Consultancy (Sevo) had prepared this Regulation 22 written statement for Vulcan Property II Limited (Vulcan). The written statement responds to matters, issues and questions as set out by the Inspector at *SA/ED33 Sandwell Local Plan 2024-2041 – Examination Matters, Issues and Questions (MIQs) for Hearing Week 1* of the Sandwell Local Plan (the SLP) Examination.
- 1.2 This submission is made ahead of the Local Plan Examination Week 1 hearing sessions scheduled to be held between Tuesday 15 July 2025 and Thursday 17 July 2025. Friday 18 July 2025 is a *Week 1* reserve day.
- 1.3 This written statement responds to the issues and questions associated with **Matter 2 | Vision, Objectives, Sandwell's Housing and Employment Needs, and the Plan's Overall Scale of Growth**. The corresponding hearing session is scheduled to take place on **Wednesday 16 July 2025**. Sevo intends to attend this hearing session to give oral evidence for Vulcan. Ahead of its attendance at the hearing session, Sevo has submitted this written statement ahead of the deadline of **midday Thursday 12 June 2025**.
- 1.4 Vulcan owns a site of 1.14ha at Brades Road, Oldbury. Vulcan put the site forward in response to the Local Plan Call for Sites as suitable for brownfield housing development. The site is included in the submission version of the plan, as a proposed housing allocation.
- 1.5 Vulcan has previously submitted representations at the following stages of development plan preparation:
- Issues and Options / Call for Sites – February and March 2023
 - Regulation 18 Preferred Options – six weeks to 18 December 2023
 - Regulation 19 Publication Draft – six weeks to 4 November 2024
- 1.6 Vulcan also made submissions following a draft Sandwell Housing Market Assessment Update (HMA) stakeholder workshop, held in June 2024.
- 1.7 Preparation of the SLP was preceded by the Council, together with Dudley Council, Walsall Council and the City of Wolverhampton, progressing The Black Country Plan 2039 (the BCP). The BCP reached Regulation 18 stage before being abandoned in October 2022 because the four councils were unable to reach agreement on the approach to planning for future development needs within the framework of the BCP. Vulcan had made representations at Issues and Options/Call for Sites and Regulation 18 stages, with its Brades Road site included in the BCP as a proposed housing allocation.
- 1.8 Reference to the National Planning Policy Framework (the Framework) are to the version published in December 2023, unless explicitly stated otherwise.
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2. Matter 2 – Written statement

M2 Vision, Objectives, Sandwell's Housing and Employment Needs, and the Plan's Overall Scale of Growth

Issue 2b – Whether the assessment of housing needs and the plan's overall scale of housing growth for the settled community are justified, positively prepared, effective and consistent with national policy.

Q2.3 Is the plan's total housing requirement of at least 10,434 net new home (which the plan states would result in unmet need for 15,916 homes in the borough over the plan period 2024-2041), justified? Including:

Q2.3d) Are the assessments of land capacity for residential development in Sandwell, and the site selection methodology and process used to inform the selection of sites for allocation in the plan, sufficiently robust? Including:

i. How have constraints to development in the borough influenced site selection, capacity, and the Plan's overall spatial strategy

M2.3.1 Vulcan raises no issue with the site selection methodology, but raises:

- i. a need for greater clarity generally over constraints to identifying sites, and explanation of mitigation for the below SM requirement adopted; and
- ii. questions over the approach adopted in determining the potential yield from sites.

M2.3.2 The wording of policy SH01 as contained in the Regulation 19 draft is little changed when compared with previous iterations. The Regulation 18 draft read "Sufficient land will be provided to deliver at least 11,167 net homes over the period 2022-2041." In the Regulation 19 version, it reads "Sufficient land will be provided to deliver at least 10,434 net new homes over the period 2024-2041." Across the Regulation 18 and 19 iterations, Tables 5 and 7 respectively set out the 'Housing Land Supply'. The Regulation 19 requirement reflects what the Council considers can be realistically delivered over a 17 year period, having regard to sites under construction, sites with planning permission, and proposed allocations. This is a significant shortfall against the SM requirement.

M2.3.3 The Framework states that the SM provides an advisory starting point, and not a target. Paragraph 61 sets out that:

'There may be exceptional circumstances, including relating to the particular demographic characteristics of an area, which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect the current and future demographic trends and market signals'.

M2.3.4 The Planning Practice Guidance (PPG) directs that:

'The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the

impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates¹.

- M2.3.5 The PPG goes on to detail when such circumstances might exist. It sets out that circumstances where this may be appropriate include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of: growth strategies that are likely to be deliverable; strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; and an authority agreeing to take unmet need from neighbouring authorities.
- M2.3.6 The overriding conclusion of the June 2024 HMA (HOU 001) is a requirement to plan for a significantly greater number of net additional dwellings per annum when compared with delivery rates achieved in recent years. To achieve this requires a proactive approach to planning (and delivery), working with promoters, developers and housebuilders to plan for, and ultimately deliver, high density developments on sites which are can justifiably be included as plan allocations.
- M2.3.7 It is clear that the upturn required will necessitate every reasonable opportunity being taken to increase capacity of development sites alongside working towards achieving viable schemes.
- M2.3.8 The economic growth plan for Sandwell, including the primary objectives of the *Sandwell Business Growth Plan* and the *Sandwell Regeneration Strategy*, provide useful context for the site selection methodology. The regeneration strategy sets as its first five-year objective, to:
- ‘Facilitate and deliver more new homes and more affordable housing across the borough, faster’.*
- M2.3.9 There is no clear explanation in the draft SLP of how the Council has considered, or reflected previous consideration of, the potential that exceptional circumstances exist for a housing requirement which is different to the SM calculated requirement. The PPG refers to exceptional circumstances where actual housing requirement is considered to be higher. The Council has adopted a figure significantly below the SM figure, which might also be considered to be *exceptional* in the context of the PPG. The SLP sets out is its following of a *Balanced Green Growth* approach, as referenced in the March 2025 *Topic Paper – Housing* (SA/ED24).
- M2.3.10 Paragraph 3.12 of the draft SLP states that:
- ‘The Council recognises that it is not possible to provide for all the identified housing and employment land needs within its administrative boundaries, given the circumstances around land deliverability, extant land-use constraints and the need to protect the unique natural and built heritage’.*
- M12.3.11 It is not clear from the above whether it is land constraints identified at paragraph 3.12 that are the sole driver for a housing requirement significantly below the SM figure with

¹ Paragraph: 010 Reference ID: 2a-010-20201216 Revision date: 16 12 2020

the *Balanced Green Growth* approach mitigation for this, or conversely if the *Balanced Green Growth Approach* is part of the reason for the below SM figure adopted.

M2.3.12 The SLP needs to be absolutely clear on the reasons behind the housing requirement figure adopted, including referencing the outcomes of its engagements with neighbouring authorities through the duty to cooperate and whether the *Balanced Green Growth* approach is part of the reasoning or conversely mitigation for the constraints on the housing requirement already in play. It is acknowledged that more recent examination documentation tabled by the Council in June 2025 seeks to draw conclusions around its duty to cooperate obligations.

M2.3.13 Given the housing requirement figure adopted, it is imperative that density is maximised on all housing development sites available. Whilst responses given to Vulcan submissions at previous stages of plan preparation have solicited confirmation from the Council that densities quoted in draft policy SH03 are minimum density standards, it is considered that the housing policies of the SLP should be explicit in stating on which sites very high densities could be achieved. This must be part of mitigation for constrained site availability (and therefore selection), necessary to push housing delivery potential closer to the SM figure.

Q2.3f) Have all potential sources of housing land supply been explored and exhausted such that a housing requirement below the objectively assessed need could be justified?

M2.3.14 Vulcan raises no issue with the site selection methodology, but does not believe that all housing land supply options are fully explored and exhausted because there is scope for greater densities to be achieved than the indicative minimum densities quoted against sites. The Council should review its density considerations, and this should be part of mitigation for constrained site selection, in seeking to push housing delivery potential closer to the SM figure.

Q2.4 In terms of this issue, are any main modifications necessary for soundness?

M2.3.15 The Council should revisit the broad-brush indicative minimum densities afforded to proposed site allocations, instead considering on a site by site basis the potential for delivery at much higher densities. Given the site constraints at play, and the limited options for development across administrative boundaries through duty to cooperate, the Council should look to fully maximise development densities.

M2.3.16 Fully maximising development densities could require compromise on transport accessibility standards and walkability, but there must be an acknowledgement that the need to achieve closer to SM housing requirements needs positive compromise in the context of other land use planning ideals.

M2.3.17 The Council should consider a main modification of site by site target densities, to replace its current across the board application of minimum densities.