

Examination of the Sandwell Local Plan 2024-2041

Hearing Statement prepared on behalf of the Police and Crime Commissioner for the West Midlands (PCCWM) (Respondent ID Ref: 1482 to 1509)

MATTER 2:

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

Introduction

The Tyler Parkes Partnership Limited has previously made detailed representations at the Regulation 19 stage on behalf of the PCCWM (November 2024, Respondent ID Ref: 1482 to 1509). Those substantive representation are already before the Inspectors, available in full, online at the following url: [Sandwell Metropolitan Borough Council - Sandwell Local Plan - Reg 19 Publication](#)

Nature and Extent of this Statement

This Hearing Statement is submitted in direct response to the specific questions raised by the Inspectors under Matter 2: Vision, Objectives, Sandwell's Housing and Employment Needs, and the Plan's Overall Scale of Growth (selected questions only).

It is not the intention to restate, verbatim, what has been submitted previously, however some repetition will occur as each question is addressed in turn, below.

Inspectors' Questions

Issue 2a – Whether the vision, priorities and strategic objectives have been positively prepared and are justified, effective and consistent with national policy for the achievement of sustainable development.

Q2.1 Are the plan's vision, priorities, and strategic objectives justified, consistent with national policy, and relevant for Sandwell?

The answer is no, for the reasons set out in PCCWM's submissions.

The PCCWM believes, in accordance with national planning policy, that the theme of community safety and crime prevention should be given greater prominence in the 'Spatial Portrait', 'Challenges and Issues' and Chapter 1 – Sandwell 2041: Spatial Vision, Priorities and Objectives of the draft Reg 19 Sandwell Local Plan consultation, to promote improvements in community safety, reducing crime, fear of crime and anti-social behaviour, which are vital objectives in the context of creating sustainable communities.

Suggested modifications to the plan to address the points have been set out in the representations (specifically those referenced ID: 1482 and 1483).

Annex 2: Glossary of the NPPF (Dec 2024) confirms, inter alia, that: Essential Local Workers amount to "public sector employees who provide frontline services in areas including community safety – such as police." (author's emphasis).

With particular reference to criterion 20 c) of the NPPF (Dec 2024), the Plan fails to consider and address the direct implications of the proposed level of growth upon community facilities and associated infrastructure: specifically the impact upon West Midlands Police and associated additional infrastructure needs arising from new development to ensure that the efficient and effective policing of the Borough.

Q2.2 In terms of this issue, are any specific main modifications necessary for soundness?

Yes, as set out in the original objections. At the time this statement was drafted the PCCWM is not aware of emerging modifications proposed by the Council that directly address those matters.

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

d) 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?**

f) **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?**

The PCCWM's interest in these questions is limited to the treatment of surplus parcels of land that were submitted into the plan making process.

Details of the sites submitted and seeming inconsistency in the way they have been treated are set out in the PCCWM objections. In summary, the position is as set out in the Table 1 below. Whether all of the potential housing capacity has been included in the plan is not entirely clear. One site, at Oldbury, while small, does not appear to have been assessed through the plan making process. Although the PCCWM understands and accepts that 'exception sites' are not to be dealt with through the Examination process at this stage, he notes that the Council's Main Modifications process chose to include land at Rowley Regis Golf Course but, not other potential opportunities omitted at this point.

Table 1: Sites submitted in the Local Plan process on behalf of PCCWM

Site	Status in the local documentation	Observations
Windmill House, Windmill Lane, Smethwick	Included as SH64 (10 dw) in Appendix B, allocated on the Policies Map but missed off the Interactive Map.	Inclusion in Appendix B and Policies Map welcome but omission from the Interactive map and phasing assumptions (PCCWM would suggest <5years) raise queries re housing land supply.
Wednesbury Police Station 53 Holyhead Road, Wednesbury WS10 7DF	Included as SH66 (15 dw) in Appendix B, allocated on the Policies Map but missed off the Interactive Map.	Inclusion in Appendix B and Policies Map welcome but omission from the Interactive map and phasing assumptions (PCCWM would suggest <5years) raise queries re housing land supply.
Smethwick Police Station, Piddock Rd, Smethwick	Selected for housing (c60 dw) but not would not appear to be allocated (Ref SH65) in the plan. Site neither listed in Appendix B nor allocated on Interactive Map or Policies Map.	Unclear if this site is included in the plan or the supply of housing land.

Oldbury Police Station, Oldbury Ringway, Oldbury B69 4JW	This site, which could be an apartment-type scheme (Potential capacity for 15+ apartments) given its town centre location, not apparently not considered as part of the 2024 SHLAA. This might be in error with the site having been submitted via the Call for Sites. Not included in Appendix B also not on interactive map or Policies Map.	Site suitability would be subject to assessment and dealt with as an exception site.
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The Tyler Parkes Partnership Limited
On behalf of the PCCWM
June 2025