

Matter 3 |
The Spatial Strategy (Policy SDS1) and other
Framework Policies (SDS2 – SDS8)
Written statement

Sandwell Local Plan 2024-2041
Submitted for Examination

Vulcan Property II Limited

June 2025

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Preliminaries

Local authority

Sandwell Council

Local plan

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Matter 3 The Spatial Strategy (Policy SDS1) and other Framework Policies (SDS2 – SDS8)	Issue 3a – Whether the strategy for the spatial distribution of new development (Policy SDS1) is based on robust evidence and is justified, positively prepared, effective and consistent with national policy.	Q3.1 b), c), e), f))	5-6
	Issue 3b – Whether the plan's overall growth strategy is deliverable including in terms of viability.	Q3.3	6-8

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 3 | The Spatial Strategy (Policy SDS1) and other Framework Policies (SDS2 – SDS8)**. The corresponding hearing session is scheduled to take place on **Thursday 17 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 3 – Written statement

M3 The Spatial Strategy (Policy SDS1) and other Framework Policies (SDS2 – SDS8)

Issue 3a – Whether the strategy for the spatial distribution of new development (Policy SDS1) is based on robust evidence and is justified, positively prepared, effective and consistent with national policy.

Q3.1 Is the plan's spatial strategy as set out in chapter 2 and policy SDS1 based on robust evidence and justified in terms of the amount, type, and spatial distribution of development? Including:

- b) Does the spatial strategy make effective use of land including previously developed land and underutilised land?*
- c) Does the spatial strategy optimise the density of development?*
- e) Is the policy sufficiently clear how unmet development needs will be addressed?*
- f) Is the policy consistent with the plan-making expectations of NPPF paragraph 11?*

M3.1.1 In respect of Q3.1 b), Vulcan considers that the spatial strategy and site selection process and methodology used to inform the election of sites for allocation in the SLP are robust, and offer the potential for effective use of land including previously developed and underutilised land. However, that potential is not properly exploited by the approach to site density and yield.

M3.1.2 Vulcan considers that Q3.1 b) and Q3.1 c) tabled by the Inspector have to be read together. The fact that the spatial strategy and the wider draft SLP do not optimise the density of development, means that the spatial strategy cannot be considered as currently making effective use of land including previously developed land and underutilised land.

M3.1.3 Given the below SM 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 confirmed 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 the constraints of restricted options in site selection, in seeking to push housing delivery potential closer to the SM figure.

M3.1.4 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 site densities and the yield returned.

M3.1.5 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 ideals.

- M3.1.6 The Council should consider a main modification of site by site target densities, rather than across the board minimum densities.
- M3.1.7 In response to Q3.1 e), there is a precursor to whether the draft SLP is sufficiently clear on how unmet development needs will be addressed. The precursor is for further interrogation of site densities, to determine which sites have the potential for a greater yield than the minimum densities currently ascribed to them. Once that exercise is completed, the overall delivery potential may paint a different picture in terms of the gap between the SM generated housing requirement and the deliverable units across proposed SLP allocations.
- M3.1.8 The same response can be given in respect of Q3.1 f). In determining whether this approach meets the Framework paragraph 11b) test of meeting OAN, an important consideration is whether the Council has done all that it can to maximise housing delivery through optimising densities. Only then could it be said that the Council has exercised its duty in addressing the strategic priorities for the development and use of land within the Sandwell plan area.
- M3.1.9 The paucity of developable housing sites, past under-delivery and an annual requirement adopted that is significantly below the SM baseline figure are clearly illustrative of a requirement for maximising densities.

Issue 3b – Whether the plan’s overall growth strategy is deliverable including in terms of viability.

Q3.3 In broad terms, is the plan’s scale and distribution of housing for the settled and travelling communities and scale and distribution of employment growth financially viable, including with regard to normal development costs and mitigation, and all relevant policy costs including affordable housing, habitats sites mitigation, infrastructure contributions, and design requirements?

- M3.3.1 Vulcan raises no specific issue on the proposed distribution of development, but raises issues with the scale of development in the context of development densities that might be achieved.
- M3.3.2 Demographic changes also point to a need for focus on high density development.
- M3.3.3 Having regard to the 2024 Housing Market Assessment (HOU 001), population is expected to grow in all age groups (except 0-14) and the greatest levels of growth are expected to be experienced in the 65-74 and 75+ age groups.
- M3.3.4 The working age population is set to grow by 31,000 over the plan period.
- M3.3.5 Growth in household types is expected to be relatively balanced, but growth is most notably expected to be in one person households.
- M3.3.6 In terms of tenure, the current picture is 54% owner-occupied, 20% private-rent and 26% social rent/affordable rent. Whilst this is not expected to change materially over

the plan period, growth in shared ownership, from a low base of 0.4%, to 1.7% translates into a requirement for over 2,000 additional units over the period to 2041.

- M3.3.7 Turning to affordability, over 50% of lone parent households would be unable to afford market housing (if they were to move home now). A significant proportion of single person households are also unlikely to be able to afford market housing. Households requiring a large homes (4+ bedrooms) are least likely to be able to afford market housing.
- M3.3.8 The HMA confirms a need to plan for a significant annual increase in the number of households. There is a particular need to plan for one person households, and this is without having regard to the implications of more recent household projections which indicate that population growth in England is increasingly driven by net in-migration.
- M3.3.9 The predicted high rate of household growth, coupled with average house prices relative to income, which raise affordability and viability issues, and the expected high proportion of additional one person households provide clear direction towards planning for high density development and a high proportion of apartments geared towards individual living.
- M3.3.10 Housing delivery in Sandwell will require a high proportion of delivery to be on brownfield land, which typically means higher development costs. There is also an evident need to provide for a significant proportion of affordable housing, which raises further questions over viability. The findings of the HMA must be read in context with an understanding of viability issues that will be faced by developers and housebuilders seeking to deliver on brownfield land a high proportion of the housing development needed.
- M3.3.11 Draft *policy SH04 – Affordable Housing* in the consultation draft SLP referred to a minimum 25% subject to viability. This was based on a 2021 Black Country Housing Market Assessment, which suggested that 31.7% of new homes would need to be affordable. The same assessment run in the 2024 HMA returns a result of 33.6%.
- M3.3.12 The Regulation 19 policy SH04 Criterion 2 includes thresholds whereby the minimum proportion of on-site affordable housing varies depending on the nature of the relevant site. The wording states “*All developments of ten homes or more should provide a proportion of affordable housing on site where this is financially viable.*” Accordingly, the policy recognises that viability may preclude delivery of on-site affordable homes. The minimum proportion of affordable housing that should be provided, as set out in draft Policy SH04, are as follows:
a. On all sites in lower value zones and brownfield sites in medium value zones – 10% affordable housing;
b. On greenfield sites in medium value zones – 15% affordable housing;
c. On all sites in higher value zones – 25% affordable housing.
- M3.3.13 In doing so, draft policy SH04 is now paying proper regard to the HMA and market conditions. The policy SH04 minimum thresholds are supported by Vulcan, subject to the *where financially viable* caveat. This acknowledges that providing a minimum of 25% affordable homes in a low value zone and on a brownfield site in a medium zone area could impact on delivery significantly – hence the justification for a reduction to 10% with allowance for further reduction should this be justified on viability grounds.

- M3.3.14 Having regard to market conditions, market demands and the matters raised at Q3.3 of development costs and mitigation, and relevant policy costs including affordable housing, habitats sites mitigation, infrastructure contributions, and design requirements, it is clear that flexibility in affordable housing thresholds is a prerequisite as is reflection of different property values across different areas within the brough.
- M3.3.15 In respect of development density, where there is potential to increase and maximise densities this should be taken. This needs to be reflected in main modifications, with target density thresholds stipulated on a site by site basis.
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