

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 3:

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

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 3: Spatial Strategy (Policy SDS1) and other Framework Policies (SDS2 – SDS8) (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 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?

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 the seemingly 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 Police Station, 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, a completely new housing site allocation, 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. Suggested capacity of c60 apartments, 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.

Q3.2 In terms of this issue, are any main modifications necessary for soundness?

It might be that some of the matters raised above could be dealt with as minor modifications (such as omissions from the Interactive Map) but others such as the Site of Smethwick Police Station being included but not seemingly integral to the documentation might need to be a main modification. The position on potential omission sites is less clear.

On a different matter, the PCCWM has set out a suggested modification to Policy SDS1 in its Regulation 19 submissions. For ease of reference this is reproduced below.

The PCCWM objected to the Spatial Strategy (Policy SDS1), which provides the overarching strategy for Sandwell and sets out the broad scale and distribution of new development for the Plan period to 2041, because it fails to clearly specify what is meant by sufficient infrastructure to be delivered to meet identified requirements to ensure that the required levels of development are sustainable and it makes no reference to the requirement for planning proposals to address crime and safety.

The PCCWM works in the community and is a key Council partner and a key stakeholder in the Borough. As the overarching policy, it is of vital importance that Policy SDS1 specifies that development should provide the necessary emergency services infrastructure, and maximise safety, crime prevention and reducing fear of crime.

The PCCWM requests that the policy be amended at 1c) by adding **‘...including police and emergency infrastructure’** and in Part 2 by a new point **‘...ensuring all new development maximises safety, reduces crime and the fear of crime’**.

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?

The PCCWM’s objections to Chapter 12 Infrastructure and Delivery (including Policy SID1) set out extensive justification in relation to this Issue. It is not intended to reproduce these here but refer the Inspector to Representation Ref: 1508. It is assumed this is a matter that will feature in future examination sessions.

Notwithstanding, the PCCWM does not believe the work on viability has given sufficient regard to the funding of Policing infrastructure. Accordingly, the approach is wholly unsatisfactory and simply ignores the fully evidenced justification provided. Put simply, new development will place a greater strain on the Police Service and therefore the suggested mitigation set out in the objections is entirely justified.

Growth during the plan period will inevitably have implications for the maintenance of safety and security in the Borough and there will clearly be a need for additional and/or enhanced Police infrastructure.

Q3.5 In terms of this issue, are any main modifications necessary for soundness?

If additional policing infrastructure is not provided, future growth in Sandwell will seriously impact on the ability of the Police to provide a safe and appropriate level of service and to respond to the needs of the local community. That outcome would be contrary to national policy.

Without this, the PCCWM objects to the Regulation 19 draft Sandwell Local Plan. As the statutory Development Plan, it is the purpose of the draft Sandwell Local Plan to confirm the types of infrastructure which will be required to provide sustainable development in the Borough during the plan period and a new policy should be drafted accordingly.

Issue 3c – Whether the plan is positively prepared, justified, effective, and consistent with national policy in relation to its other Framework Policies (Policies SDS2 – SDS8).

Apart from those matters highlighted above the PCCWM acknowledges the generally positive approach by the Council in adopting a number of suggested changes to the policy approach in the plan that were raised through the Regulation 18 consultation process.

As will be clear from his submissions no other specific modifications are sought to Policies SDS2 – SDS8.

**The Tyler Parkes Partnership Limited
On behalf of the PCCWM
June 2025**