



Matter 6 | Health and Wellbeing (SHW1 – SHW6) Written statement

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

Vulcan Property II Limited

August 2025

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Written statement contents

- Preliminaries
1. Introduction
 2. Matter 6 - Written statement

Preliminaries

Local authority

Sandwell Council

Local plan

Sandwell Local Plan 2024-2041

Written statement

The following table sets out Matters, Issues and Questions to which the written statement relates

Matter	Issue	Question(s)	Page(s)
Matter 6 Health and Wellbeing (SHW1 - SHW6)	Issue 6 - Whether the plan is positively prepared, justified, effective and consistent with national policy with regard to its policies for health and wellbeing.	Q6.3	5
		Q6.4	5-6

1. Introduction

- 1.1 Sevo Planning Consultancy (Sevo) has 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/ED59 Sandwell Local Plan 2024-2041 – Examination Matters, Issues and Questions (MIQs) for Weeks 2 and 3* of the Sandwell Local Plan (the SLP) Examination.
- 1.2 This submission is made ahead of the Local Plan Examination Week 2 and 3 hearing sessions scheduled to be held between Tuesday 23 September 2025 and Friday 3 October 2025. Friday 26 September 2025 (PM) and Friday 3 October 2025 (PM) are *Week 2* and *Week 3* reserve sessions.
- 1.3 This written statement responds to the issues and questions associated with **Matter 6 | Health and Wellbeing (SHW1-SHW6)**. The corresponding hearing session is scheduled to take place on **Wednesday 1 October 2025 (PM)**. 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 28 August 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 6 – Written statement

M6 Health and Wellbeing (SHW1-SHW6)

Issue 6 – Whether the plan is positively prepared, justified, effective and consistent with national policy with regard to its policies for health and wellbeing.

Q6.3 Is policy SHW3 justified and consistent with national policy in its approach to air quality?

M6.3.1 Vulcan raised objection to the Regulation 18 wording of SHW3, given its requirement that new development must be at least air quality neutral following any required mitigation. The Regulation 19 version omits this wording, instead requiring that new development must demonstrate how its occupiers and users would be affected by air quality and how the development itself affects air quality.

M6.3.2 In its Regulation 19 representations, Vulcan set out that the requirements of SHW3 should exclusively relate to major development proposals and / or sites located within an Air Quality Management Area (AQMA). The planning practice guidance confirms that no assessment should be triggered where a development is not anticipated to give rise to concerns about air quality.

M6.3.3 In its SA/ED2 the Council proposes a minor amendment to set out that an AQMA is in place across the Sandwell administrative area. For the policy to be sound, it must refer to an air quality assessment only being required for major development proposals and / or sites located within an AQMA. This is important, given that the Sandwell AQMA was declared in 2005 and there is potential for its status could change within the plan period.

Q6.4 Are the requirements of policy SHW4 justified, including in relation to development viability. Will the policy be effective?

M6.4.1 Vulcan raised objection to the Regulation 18 wording of SHW4, given that the policy failed to acknowledge that the expectation regarding provision of open space / open space contributions should be based upon whether there is a demonstrable shortfall and/or resultant need in the locality of a development site.

M6.4.2 In its Regulation 18 response, the Council references its green spaces strategy and its recording of the current level of provision available to residents in the highly urbanised borough. The Council references the SLP viability appraisal taking this into account. SA/ED2 sets out that the viability appraisal includes the cost for open space and play provision in cost assumptions.

M6.4.3 Whilst it is acknowledged that SHW4 allows for a commuted sum to be made in lieu of on-site open space provision, which might apply in circumstances where there is no physical capacity on site, this does not address the fact that any requirement should be based upon the level of provision within the area of a proposed development. Also, a consideration of viability is applicable in the context of both on-site provision and off-site contributions.

- M6.4.4** Whilst SID1 provides an invitation to an applicant to submit a viability assessment, where it is considered that the provisions of planning contributions would make a development proposal unviable, this should only be a requirement in circumstances where there is a demonstrable case for open space provision locally.
- M6.4.5** SHW4 should acknowledge that that the expectation regarding provision of open space provision / open space contributions should be based upon whether there is a demonstrable shortfall and / or resultant need in the locality of a development site, and then a consideration of whether provision can be accommodated both physically and in terms of financial viability.
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