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# **Matter 7 | Housing (SH01 – SH010) Written statement**

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

**Vulcan Property II Limited**

**August 2025**

w: [www.sevoplanning.co.uk](http://www.sevoplanning.co.uk)

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# Preliminaries

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## Local authority

Sandwell Council

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## Local plan

Sandwell Local Plan 2024-2041

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## Written statement

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

Matter	Issue	Question(s)	Page(s)
Matter 7   Housing (SH01 – SH010)	Issue 7 – Whether the plan is positively prepared, justified, effective and consistent with national policy in its approach to delivering sustainable housing growth.	Q7.5 a), b), c)	5-6

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# 1. Introduction

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- 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 7 | Housing (SH01-SH010)**. The corresponding hearing session is scheduled to take place on **Tuesday 23 September 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 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 7 – Written statement

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### M7 Housing (SH01-SH010)

**Issue 7 – Whether the plan is positively prepared, justified, effective and consistent with national policy in its approach to delivering sustainable housing growth.**

*Q7.5 Is policy SH05 justified and consistent with national policy in its approach to national accessibility standards and custom and self build housing? Including:*

- a) Are the requirements generally achievable and viable in the Sandwell context?*
- b) Is the 5% requirement for self or custom build plots in criterion 2 appropriate?*
- c) On what basis is the six months sales/marketing period set out in criterion 4 justified? Will it be effective?*

- M7.5.1 Vulcan made submissions at Regulation 18 and Regulation 19 stages regarding the approach to M(2) (Category 2: Accessible and adaptable dwellings) and self / custom build home plots.
- M7.5.2 Part M of the building regulations provides appropriate direction in terms of building accessibility. The Government has proposed to mandate M4(2) as a minimum requirement, leaving M4(1) to apply by exception only when M4(2) is impractical and unachievable. There is to be further technical consultation ahead of M4(2) being introduced as a mandatory minimum. There is no requirement for development plan policy to repeat Part M or any regulatory requirements pursuant to the Building Act.
- M7.5.3 As set out in previous submissions, the Council response to the Vulcan Regulation 18 representations is that once M4(2) is adopted policy SH05 will be amended accordingly. This corroborates a position that there is no requirement for M4(2) to be the subject of development plan policy as its mandatory requirement or otherwise is the subject of building regulations. It need not be duplicated in development plan policy.
- M7.5.4 In respect of Q7.5b) and the 5% requirement for self or custom build plots on developments of 100+ dwellings, Vulcan maintains the view that this could be prejudicial to the effective masterplanning and delivery of development on a site. Vulcan maintains that the absolute requirement for developments of 100+ dwelling to provide self or custom build plots should be removed from the policy.
- M7.5.5 The Council response to the Vulcan Regulation 19 representations is that there is a clause within the policy that allows for self / custom build plots to transfer out of that requirement into open market housing after a period of six months sales/marketing. Whilst this is a sound policy approach for sites where there is good reason to include self / custom build plots, Vulcan maintains that only some sites might be appropriate for self / custom build including having regard to the self-build register held by the Council.
- M7.5.6 The requirement that all developments of 100+ dwellings should include a 5% requirement for self or custom build plots should not be absolute. The policy should instead set an expectation of 5% unless a site is demonstrably unsuitable for a proportion of self or custom build plots and/or there is no demonstrable demand.

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