

**Sandwell Local Plan 2024-2041 – Examination  
Hearing Statement on behalf of Oldbury (Smethwick) Ltd  
Matter 7 – Housing Policies**

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

**Q7.3 Is policy SH03 justified and consistent with national policy in its approach to housing density, type and accessibility? Including:**

- a) Are the requirements generally achievable and broadly viable in the Sandwell context? Are they justified?**
- b) For soundness, should the Table 6 requirements in SH03 be expressed as indicative targets, rather than minimum requirements?**

Draft Policy SH03 (Housing Density, Type and Accessibility) requires all developments of 10 or more homes to achieve the minimum net densities set out (depending on locational sustainability) “except where this could prejudice historic character and local distinctiveness as defined in Policy SHE2”.

However, any housing density targets should be expressed as an indicative target, rather than a minimum requirement, to prevent the Policy being overly prescriptive and to give flexibility to ensure that development is ultimately viable and deliverable.

It is also not clear whether the minimum density requirements apply to the gross site area or the net developable area. As such, draft Policy SH03 should be amended to ensure that the densities required are indicative (only) and apply to the net (or developable) land areas to ensure that the targets are achievable.

This required clarity is particularly important for the housing allocation sites where some of the allocation sites have a net density calculated on the net developable area but others, like SH55 for example, have a net density calculated across the whole site area and do not reflect or consider the net developable area. Applying a density across the whole site is not deliverable and consistency is needed.

However, the ability for any site to achieve any minimum density requirement will depend upon a range of site-specific factors, such as site constraints, delivery against other policy requirements (like draft Policy SMD1’s requirements to deliver sustainable design and technology and urban greening / green infrastructure for example) as well as each specific proposal’s ability to deliver a suitable mix needed to achieve the required density, factoring in market demand and need for example, as well as viability – which is fundamental if any homes are to be delivered at all.

It is strongly considered that the onerous minimum housing density required is one factor why there has been poor delivery from often long-allocated housing sites during the Black Country Core Strategy period to date, for example.

Clearly the density requirement will need to balance other policy and density mix requirements, as well as both market demand and need, as well as site-specific constraints – and not just whether meeting the net density requirements would prejudice historic character and local distinctiveness (as referenced within the Policy).

As such, draft Policy SH03 must be updated to ensure that there is flexibility and should express the required densities as 'indicative targets' rather than 'minimum' requirements. It should also add clarity around whether the more flexible targets should be applied to the gross site area or the net developable area, as applying the targets to the gross site area is not deliverable and therefore not sound.