
Sandwell Local Plan 2024-2041 - Examination

Inspector

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Programme Officer

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MATTERS, ISSUES AND QUESTIONS for Hearing Week 2

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| Matter 7: Housing (Policies SHO1 – SHO10) |
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Issue 7 – Whether the plan is positively prepared, justified, effective and consistent with national policy in its approach to delivering sustainable housing growth.

Note: The overall housing requirement number set out in policy SHO1 (which reflects the requirement set out in policy SDS1), and the housing trajectory and housing land supply, are dealt with under other Matters. The following questions relate to the other aspects of policy SHO1.

Q7.1 Is policy SHO1 justified, effective, positively prepared, and consistent with national policy? Including:

- a. In broad terms, will the policy and sources of supply set out in Table 7 be reasonably likely to deliver the plan's requirement for at least 10,434 net new homes over the plan period?
- b. Is it appropriate for site allocations, including for any identified strategic sites, to be set out in Appendix B? For soundness, would it be necessary for any of the site allocations be set out in site-specific policies instead? And, if so, for which allocation(s)?
- c. Are the date ranges in criterion 2 and Table 5 intended for phasing the delivery of planned housing growth, or another reason? What evidence justifies the approach?
- d. What evidence supports the 5%, 10%, and 15% discount rates for non-implementation applied in Table 5 and are those levels of discount appropriate and justified for the associated type of housing supply?
- e. Is the policy's approach to and degree of reliance upon additional housing supply from windfall sites justified and consistent with national policy? Will it be effective, including when considered together with policy SHO2?
- f. Is criterion 4 justified and will it be effective? How does it relate to other policies in the plan?
- g. Should the policy include reference to required contributions for infrastructure to support development?

Q7.2 Are the requirements of policy SHO2 justified, positively prepared and consistent with national policy? Including:

- a. Are the requirements clear? Are they too restrictive?
- b. Will they be effective, including when taken together with policy SHO1?
- c. For soundness, is it necessary for the policy to set out a more supportive and flexible approach to windfall housing development?
- d. Is it justified that criterion 2b relates to Council-owned land?
- e. Should the policy include reference to required contributions for infrastructure to support development?

Q7.3 Is policy SHO3 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 SHO3 be expressed as indicative targets, rather than minimum requirements?

- Q7.4** Are the requirements of Policy SHO4 justified and consistent with national policy? Including:
- a. Does the policy incorporate suitable flexibility for dealing with circumstances of unviable development?
- Q7.5** Is policy SHO5 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?
- Q7.6** Is policy SHO6 justified and consistent with national policy in its approach to protecting family housing?
- Q7.7** Are policies SHO7 and SHO8 justified, effective, and consistent with national policy?
- Q7.8** Is policy SHO9 clear, justified and positively prepared? Will it be effective in delivering the accommodation needed for Gypsies, Travellers and Travelling Showpeople over the plan period? Including:
- a. For soundness, should the policy set out the identified needs for additional pitches and/or plots over the plan period (the level of needs was considered under an earlier Matter)?
 - b. Are all the policy's criteria justified with regard to the Public Sector Equality Duty? Are any of them adequately covered by other policies in the plan?
- Q7.9** Is policy SH10 justified and consistent with national policy in its approach to housing for people with specific needs? Including:
- a. Should the policy expressly include housing for older people?
 - b. Does the policy provide appropriate support for proposals for housing for people with specific needs?
- Q7.10** In terms of this issue, are any main modifications necessary for soundness?

| Qn. No. | Response |
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| Q7.1 | <p>This policy has been positively prepared as it identifies a supply of housing land that will meet the identified requirement, it is based on evidence in the SHLAA and is deliverable over the plan period. It is also consistent with NPPF para 60 as it aims to meet as much of the boroughs identified housing needs as is possible.</p> |
| Q.7.1a | <p>The council believes that it is reasonably likely that the requirement of at least 10434 new homes will be delivered over the plan period. The council have secured various funding streams to assist with delivering sites, they are also working with land owners to see if they can help progress sites. The council also has its own council home programme which has and will continue to deliver homes.</p> <p>Table 5 (not Table 7) sets out the various sources of housing and the capacities and when they are likely to be delivered. The sources of supply include</p> <ul style="list-style-type: none"> • sites with planning permission and under construction 33%; • sites allocated without planning permission 44%; • windfalls 20%; • additional floorspace in centres and Wednesbury Master Plan 3%. |
| Q.7.1b | <p>Although the Council are content that the site allocations are identified in Appendix B and that this is sound, they could equally be included as a chapter in the Plan and renamed Chapter 17 Sandwell Site Allocations – Strategic Site Policies and Non-Strategic Housing Allocations. This is a matter we are happy to leave to the inspector.</p> <p>The Council are also proposing to identify strategic sites based on number of homes and also sites / combination of sites that are considered to be of strategic importance to the regeneration of the borough and delivering the SLP.</p> <p>Policy SDS1 (3) can be amended to include reference to Strategic Sites. It is proposed to have two sections in Chapter 17, a Strategic Sites Policies section at the start and a second section for Non-Strategic Housing Allocations .</p> <p>Propose to have site specific policies for:</p> <p>Sites of 500 dwellings or more:</p> <ul style="list-style-type: none"> • SHO11 - Friar Park • SHO12 – Rattlechain • SHO13 – North Smethwick Canalside • SHO14 – Edwin Richards Quarry <p>Sites within West Bromwich Masterplan</p> <ul style="list-style-type: none"> • SHO15 - Cultural Quarter • SHO16 - George Street Living • SHO17 - Queens Square • SHO18 - West Bromwich Central |

| Qn. No. | Response | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| | <p>Sites within Smethwick Masterplan</p> <ul style="list-style-type: none">• SHO19 - Abberley Street• SHO20 - Cape Arm Cranford Street• SHO21 - Cranford Street / Heath Street / Canal• SHO22 - Grove Lane / Cranford Street / London Street• SHO23 - Grove Street / MMUH / School• SHO24 - Molliett Street Park <p>Mixed Use Development</p> <ul style="list-style-type: none">• SHO25 - Lion Farm | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Q.7.1c | <p>No, the timeframes are set out to show indicative capacities over 5-year periods, they are not intended for phased delivery.</p> <p>To provide clarity the table can be amended to show total capacities for each type of supply 2024-2041 and not split into timeframes.</p> <table><tr><th>Source of Supply</th><th>Type of Supply</th><th>Total Capacity 2024 - 2041</th></tr><tr><td rowspan="3">Current Supply</td><td>Site under construction</td><td>566</td></tr><tr><td>Sites with Planning Permission or Prior Approval</td><td>883</td></tr><tr><td>Site with Other Commitments (as set out in 2024 SHLAA)</td><td>63</td></tr><tr><td rowspan="4">Allocated</td><td>Occupied Employment Land</td><td>2198</td></tr><tr><td>Other Non-Occupied Employment Land</td><td>3286</td></tr><tr><td>Sites with Planning Permission</td><td>1262</td></tr><tr><td>Sites under construction</td><td>322</td></tr><tr><td colspan="2">Total Identified Sites</td><td>8580</td></tr><tr><td>Total Windfall Allowance</td><td>Small sites (<10 hoems / 0.25ha)(2030-2041)</td><td>1870</td></tr><tr><td colspan="2">Total Identified Sites and windfall allowance</td><td>10450</td></tr><tr><td></td><td>West Bromwich</td><td>5</td></tr></table> | Source of Supply | Type of Supply | Total Capacity 2024 - 2041 | Current Supply | Site under construction | 566 | Sites with Planning Permission or Prior Approval | 883 | Site with Other Commitments (as set out in 2024 SHLAA) | 63 | Allocated | Occupied Employment Land | 2198 | Other Non-Occupied Employment Land | 3286 | Sites with Planning Permission | 1262 | Sites under construction | 322 | Total Identified Sites | | 8580 | Total Windfall Allowance | Small sites (<10 hoems / 0.25ha)(2030-2041) | 1870 | Total Identified Sites and windfall allowance | | 10450 | | West Bromwich | 5 |
| Source of Supply | Type of Supply | Total Capacity 2024 - 2041 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Current Supply | Site under construction | 566 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Qn. No. | Response | | |
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| | Additional floorspace in centres | Town Centres | 70 |
| | | District and Local Centres | 95 |
| | Total additional floorspace in centres | | 170 |
| | Additional supply in Wednesbury Master Plan | | 105 |
| | Total Supply | | 10,725 |
| | Net completions | | 615 |
| | Total Supply and net completions | | 11,340 |
| Q.7.1d | <p>The use of discounts is a legacy approach from the Black Country Core Strategy and was also proposed to be used in the Black Country Plan and was applied to take account of non-implementation rates due to the difficulty of ground conditions and viability in the Black Country.</p> <p>The WMCA Brownfield Land Study [WMCA 001] also reviewed the discount rates and found that the assumptions of discounts of 5% and 10% were reasonable given past trends.</p> <p>The Housing Topic Paper [SA/ED24] provides evidence for the 5% discount rate. During 2020 an exercise was undertaken to assess the likely lapse rate of planning permission sites over the anticipated Black Country Plan period of 17 years (2022-39). All sites of ten homes or more entering the supply between 2001 and 2004 as planning permissions (rather than allocations) were analysed. In Sandwell, of the 4,030 homes granted permission on 76 sites during 2001-4, 3,886 (96%) had been completed within 17 years. It was concluded that 10% was too high a discount to apply to sites with planning permission in the existing supply, as most of them gained planning permission within the last three years. It was decided that for subsequent SHLAA reports the discount rate applied to sites with planning permission and not yet under construction would be reduced to 5%.</p> <p>It was considered prudent due to the viability issues and ground conditions to apply a discount; however, the Council are happy to remove the discounts should the Inspector be so minded.</p> | | |
| Q.7.1e | <p>The use of windfalls as part of the housing land supply is in line with paragraph 72 of the NPPF which allows for windfalls where is evidence that they will provide a reliable source of supply and should be realistic having regard to historic windfall delivery rates.</p> <p>As Sandwell is an urbanised area it is difficult to identify all potential redevelopment proposals that may arise. Which is why an allowance has been made for windfall</p> | | |

| Qn. No. | Response | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-------------------------------------|--|----------------------------|---------------------------|----------------------------|---|------------|-----|-----|-----|------------|-----|-----|-----|------------|-----|-----|-----|-----------|-----|-----|-----|-----------|-----|-----|-----|-----------|-----|-----|-----|-----------|-----|-----|-----|-----------|-----|----|-----|-----------|-----|----|-----|-----------|-----|-----|-----|-----------|-----|-----|-----|-----------|-----|-----|-----|-----------|-----|-----|-----|--------------|-------------|-------------|------------|-------------------------------------|------------|------------|------------|----------------------------------|--|------|--|
| | <p>development. Only sites of 10 homes or more are allocated in the plan, therefore sites of 9 homes or less are reflected in the windfall allowance.</p> <p>The Housing Topic Paper [SA/ED24] shows the past delivery rates from windfall development. It shows the number of windfall completions and percentage of total annual completions. It demonstrates that over the last ten years there has been an average of 28% windfalls and since 2011 an average of 25% windfalls.</p> <table><tr><th>Year Completed</th><th>Total Housing Completions</th><th>No of Windfall Completions</th><th>%</th></tr><tr><td>2011/2012*</td><td>599</td><td>153</td><td>26%</td></tr><tr><td>2012/2013*</td><td>712</td><td>109</td><td>15%</td></tr><tr><td>2013/2014*</td><td>536</td><td>120</td><td>22%</td></tr><tr><td>2014/2015</td><td>961</td><td>134</td><td>14%</td></tr><tr><td>2015/2016</td><td>561</td><td>124</td><td>22%</td></tr><tr><td>2016/2017</td><td>901</td><td>181</td><td>20%</td></tr><tr><td>2017/2018</td><td>676</td><td>146</td><td>22%</td></tr><tr><td>2018/2019</td><td>794</td><td>99</td><td>12%</td></tr><tr><td>2019/2020</td><td>501</td><td>58</td><td>12%</td></tr><tr><td>2020/2021</td><td>654</td><td>150</td><td>23%</td></tr><tr><td>2021/2022</td><td>661</td><td>237</td><td>36%</td></tr><tr><td>2022/2023</td><td>340</td><td>172</td><td>51%</td></tr><tr><td>2023/2024</td><td>647</td><td>445</td><td>69%</td></tr><tr><td>Total</td><td>6696</td><td>1746</td><td>26%</td></tr><tr><td>Annual average over 10 years</td><td>670</td><td>175</td><td>28%</td></tr><tr><td colspan="2">Total for 2029 – 2041 (12 years)</td><td>2100</td><td></td></tr></table> <p>Therefore, the council are confident that the supply identified as a windfall allowance will be delivered.</p> <p>With regards to SHO2, the Council recognises the fact that the policy may be too restrictive and may limit the number of windfalls coming forward and so the Council are proposing some amendments to SHO2 which are set out in Q7.2.</p> | Year Completed | Total Housing Completions | No of Windfall Completions | % | 2011/2012* | 599 | 153 | 26% | 2012/2013* | 712 | 109 | 15% | 2013/2014* | 536 | 120 | 22% | 2014/2015 | 961 | 134 | 14% | 2015/2016 | 561 | 124 | 22% | 2016/2017 | 901 | 181 | 20% | 2017/2018 | 676 | 146 | 22% | 2018/2019 | 794 | 99 | 12% | 2019/2020 | 501 | 58 | 12% | 2020/2021 | 654 | 150 | 23% | 2021/2022 | 661 | 237 | 36% | 2022/2023 | 340 | 172 | 51% | 2023/2024 | 647 | 445 | 69% | Total | 6696 | 1746 | 26% | Annual average over 10 years | 670 | 175 | 28% | Total for 2029 – 2041 (12 years) | | 2100 | |
| Year Completed | Total Housing Completions | No of Windfall Completions | % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2011/2012* | 599 | 153 | 26% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2012/2013* | 712 | 109 | 15% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2013/2014* | 536 | 120 | 22% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2014/2015 | 961 | 134 | 14% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2015/2016 | 561 | 124 | 22% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2016/2017 | 901 | 181 | 20% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2017/2018 | 676 | 146 | 22% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2018/2019 | 794 | 99 | 12% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2019/2020 | 501 | 58 | 12% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2020/2021 | 654 | 150 | 23% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/2022 | 661 | 237 | 36% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2022/2023 | 340 | 172 | 51% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2023/2024 | 647 | 445 | 69% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 6696 | 1746 | 26% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Annual average over 10 years | 670 | 175 | 28% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total for 2029 – 2041 (12 years) | | 2100 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Qn. No. | Response |
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| Q.7.1f | <p>The Council recognise that much of the detail in criterion 4 is covered by NPPF and SDM1 with regards to making best use of available land, not prejudicing neighbouring uses and reference to master plans. Therefore, these elements do not need to be repeated. However, the council still thinks it is valid to have a criterion regarding development of a site in a comprehensive manner so that the whole site can be delivered timely and effectively. Therefore, the Council propose a change of wording:</p> <p><i>The development of sites for housing should demonstrate be delivered through a comprehensive approach. , making best use of available land and infrastructure and not prejudicing neighbouring uses. Incremental development of an allocated site will only be allowed where it would not prejudice the remaining parts of the site coming forward for development. the achievement of high-quality design across the wider site. Masterplans and other planning documents¹⁵⁹ will be produced, where appropriate, to provide detailed guidance on the development of allocations.</i></p> |
| Q.7.1g | <p>The new proposed strategic site policies will include necessary infrastructure requirements, however, for clarity it may be prudent to include reference to required contributions for infrastructure to support development within SHO1. The Council therefore propose the addition of a further criterion:</p> <p>5. All new developments should be supported by the necessary on and off-site infrastructure to serve its needs, mitigate its impacts on the environment and the local community, and ensure that it is sustainable and contributes to the proper planning of the wider area.</p> |

| Qn. No. | Response |
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| Q.7.2 | <p>The use of windfalls as part of the housing land supply is in line with NPPF paragraph 72 which allows for windfalls where there is evidence that they will provide a reliable source of supply and should be realistic having regard to historic windfall delivery rates.</p> |
| Q.7.2a | <p>With regards to SHO2, the Council recognises the fact that the policy may be too restrictive and may limit the number of windfalls coming forward and so the Council are proposing some amendments to SHO2, which are set out below:</p> <ol style="list-style-type: none"> 1. <i>Proposals for residential development on sites not specifically allocated for residential use (windfall developments) will be permitted where the site is previously developed land and in accordance with other local plan policies.</i> 2. <i>Proposals for residential development on unallocated greenfield land will be resisted. Such sites will only be considered where:</i> <ol style="list-style-type: none"> a. <i>The site is not protected open space: or</i> |

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| | <p>b. The site is council owned land that is deemed surplus to requirements: or</p> <p>c. <i>The development of the site will bring an under used piece of land back into beneficial use and will not harm the environmental or ecological value of the site and the wider area, in accordance with other relevant policies in the SLP, or cause harm to the significance of heritage assets, including their setting.</i></p> |
| Q.7.2b | With the changes proposed to Policy SHO2 in Q7.2 A) the Council believes that the policy will be effective in delivering additional new homes. |
| Q.7.2c | Yes, the Council agree that that the policy needs to be more supportive and flexible and has therefore proposed changes to Policy SHO2 as set out in Q7.2 A). |
| Q.7.2d | No, it is not justified and therefore the Council has proposed changes to Policy SHO2 as set out in Q7.2 A). |
| Q.7.2e | <p>Yes, to provide clarity, reference to required contributions could be included in the policy. The Council therefore propose the following addition to Policy SHO2:</p> <p><u>All new developments should be supported by the necessary on and off-site infrastructure to serve its needs, mitigate its impacts on the environment and the local community, and ensure that it is sustainable and contributes to the proper planning of the wider area.</u></p> |

| Qn. No. | Response |
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| Q.7.3a | <p>Yes, policy SH03 is justified and consistent with national policy.</p> <p>The Density and Design Topic Paper (SA ED8) sets out the justification for setting minimum density requirements within policy SH03. The Topic Paper sets out the iterative process which has resulted in SH03 setting ambitious density requirements which will make effective use of land but remain achievable and broadly viable in the Sandwell context. Appendix 1 and 2 of the Topic Paper include an analysis of the density of residential areas in different parts of the borough and of a selection of major residential planning consents to illustrate that the SH03 density requirements are achievable and have been found viable in real-world development schemes.</p> <p>Paragraph 2 of SH03 requires that developments of ten homes or more should provide a range of house types and sizes that will meet the accommodation needs of both existing and future residents, in line with the most recently available information. This is consistent with NPPF paragraphs 60, 61 and 63 which seek to ensure that as much of an area's identified housing need as possible is met including with an appropriate mix of housing types for the local community. The Sandwell Housing Market Assessment Update (August 2024) (HOU 001) provides the most up-to-date information on housing needs. Requiring major residential schemes to provide a housing mix in line with the latest</p> |

| Qn. No. | Response |
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| | <p>evidence not only ensures that needs of the local community are met, but also ensures that housing schemes best align with the demand of the market, which contributes to the financial viability and market attractiveness of major residential schemes.</p> <p>Specific reference to preventing a disproportionate number of large four plus bedroom homes from being delivered is consistent with the aims of the NPPF which states that development should make efficient use of land and the findings of the Sandwell Housing Market Assessment Update (HOU 001) which identifies that only around a quarter of new housing across all tenure types needs to be four bedrooms or more.</p> <p>The NPPF at paragraph 128 explains that planning policies should support development that makes efficient use of land taking into account the availability and capacity of infrastructure and services and the scope to promote sustainable travel modes that limit future car use. Table 6 of policy SH03 sets out the accessibility criteria used to inform density requirements, with those accessibility criteria reflective of the availability of services accessed via walking or public transport</p> |
| Q.7.3b | <p>The Table 6 density requirements in SH03 should remain expressed as minimum requirements. This reflects paragraph 129 of the NPPF which emphasises that it is especially important that planning policies and decision avoid homes being built at low densities where there is a shortage of land for meeting identified housing needs and advocates the use of minimum density standards. Paragraph 3 of policy SH03 notes that the minimum density standards may be relaxed where compliance would prejudice historic character and local distinctiveness. This approach is consistent with NPPF paragraph 130.</p> |

| Qn. No. | Response |
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| Q7.4 | <p>The SHMA [HOU 001] assessed the Borough's current and future housing needs over the plan period and established a need for affordable housing. SHO4 sets out when and how much affordable housing will be required and states that it should be provided on site but allows for commuted sums in exceptional circumstances. It details a range of percentages required based upon whether brownfield or greenfield and specific market value zone. This is based upon evidence from the Viability Study [VIAB 002] which demonstrated that viability varies across the borough.</p> |
| Q7.4a | <p>Yes, criterion 5 provides for provision of a lower percentage that does not undermine the developments viability by stating '<i>the maximum proportion of affordable housing will be required that does not undermine the developments viability (policy SID1)</i>'</p> <p>This is supported by SID1 which states</p> |


| Qn. No. | Response |
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| | <p><i>‘On sites where applying the relevant planning contributions, affordable housing or accessibility requirements set out in Policies SHO4 and SHO5 can be demonstrated to make the development unviable, the maximum proportion of such housing will be sought that will not undermine the viability of the development, subject to achieving optimum tenure mix and securing other planning obligations necessary for the development to gain planning permission.’</i></p> <p>However, for clarity and consistency some additional text could be added to criterion 2.</p> <p><i>All developments of ten homes or more should provide a proportion of affordable housing on site where this is financially viable. Only in exceptional circumstances would a commuted sum be acceptable instead of on-site provision. Smaller sites, which could reasonably be expected to form part of a major development in the future, will also need to take this policy into account. The minimum proportion of affordable housing that should be provided, subject to financial viability, is.....</i></p> |

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| Q7.5 | <p><u>Accessibility Standards</u></p> <p>Yes, NPPF paragraph 60 seeks that <i>‘the needs of groups with specific housing requirements are addressed’</i>.</p> <p>Paragraph 63 states that</p> <p><i>‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include...people with disabilities..’</i></p> <p>Policy SHO5 seeks 100% of homes to meet M4(2). The Governments response to ‘Raising accessibility standards for new homes’ states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations.</p> <p>Although the requirements to meet Part M4(2) will be superseded by changes to residential Building Regulations they are not yet in place and so Policy SHO5 has the requirement until implemented.</p> <p><u>Custom and self-build housing</u></p> <p>NPPG states that</p> |

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| | <p><i>‘relevant authorities should consider how local planning policies may address identified requirements for self and custom housing building to ensure enough serviced plots with suitable permission come forward (for example, as a number of units required as part of certain allocated sites..)’</i> Paragraph: 025 Reference ID: 57-025-20210508</p> <p>and</p> <p><i>Relevant authorities must give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area. The level of demand is established by reference to the number of entries added to an authority’s register during a base period. Paragraph: 023 Reference ID: 57-023-201760728</i></p> <p>NPPF paragraph 70 states</p> <p><i>‘Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should: ... b) seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing;</i></p> <p>Although low, there is a demand for custom/ self-build homes, the demand for the base period of 31 October 2023 to 30 October 2024 was 11. Policy SHO5 seeks 5% of plots on developments of 100 homes or more to be made available for self / custom build homes which will support sites to come forward to meet self/ custom build homes need. However, the policy has flexibility as it allows for a lower percentage to be provided if demand for custom / self-build homes is lower.</p> |
| Q7.5a | <p>Yes, the requirements are considered to be generally achievable and viable, the costs of M4(2) requirements were costed and included in the Viability Study. It is expected that the requirements to meet Part M4(2) will be superseded by changes to Residential Building Regulations. The Government response to ‘Raising accessibility standards for new homes’ states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes. However, Part M4(2) is not yet incorporated into Building Regulations and so has been incorporated into Policy SHO5.</p> <p>There may be instances where site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) therefore the Council proposes the following amendments</p> <p><i>National Accessibility Standards</i></p> <p><i>1. All new homes will be required to meet M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations except where site specific factors such as vulnerability to flooding, site</i></p> |

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| | <u>topography, and other circumstances may make a specific site less suitable for M4(2).</u> |
| Q7.5b | The 5% requirement is a legacy from the Black Country Plan and is considered a suitable vehicle in which to provide self / custom build plots. The policy also has flexibility as it allows for a lower percentage to be provided if demand for custom / self-build homes is lower. |
| Q7.5c | The Regulation 18 Plan originally has a requirement for 12 months, however following representation to the consultation this was amended to 6 months to reflect that it was important that plots should not be left empty to the detriment of neighbouring properties or the whole development. As the policy only applies to sites of 100 homes or more then the self-build plots could be on the market from the start of the development and be developed out at the end of the project. |

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| Q7.6 | <p>Policy SHO6 is both justified and consistent with the National Planning Policy Framework, particularly Paragraph 63, which highlights the importance of creating mixed and balanced communities. While the paragraph focuses on affordable housing, the broader principle applies to ensuring a range of housing types, including homes for families. SHO6 responds directly to local evidence from the Sandwell Housing Market Assessment, which shows a clear need for more family-sized homes, especially those with three and four bedrooms.</p> <p>Additionally, Sandwell's waiting list register demonstrates that 17.5% are waiting three-bedroom homes which is the third highest level of demand. The policy also reflects concerns about the limited availability of land for new housing and the ongoing loss of family homes through conversions into Houses of Multiple Occupation (HMOs).</p> <p>It sets a general expectation that existing family homes should be protected, but it also includes reasonable flexibility. For example, it allows exceptions where other local priorities apply, where regeneration is needed, or where a property is no longer suitable for family use. This balanced approach ensures that family housing is not lost unnecessarily, while still allowing for change when it is clearly justified.</p> <p>Overall, Policy SHO6 supports the delivery of sustainable, inclusive neighbourhoods and helps meet the housing needs of current and future residents.</p> |

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|---------------------------|--|--------------------|-----------------|--------------------|------------|----------------------|-------|--------|-------|-----|-----|-------|-------|---------------------------|-----|-------|-------|----------|-----|-------|-------|---------------|-----|-----|-------|---------------|-----|-------|-------|------|------------------|--------------------|------------|----------------------|--------|--------|-------|-----|-------|-------|-------|---------------------------|-------|-------|-------|----------|-----|-------|-------|---------------|-----|-----|-------|---------------|-------|-------|-------|---------------|---------------|----------|-----------|-----------|------------|-------------|----------|
| Q7.7 | <p>Policy SH07 is justified as data¹ suggests that grouping too many HMOs in one location could conflict with national policy and result in poor living environments.</p> <p>NPF Ref section 8, para 96 states:</p> <p><i>“policies and decisions should aim to achieve healthy, inclusive and safe places”</i></p> <p>SH07 is effective as the policy is deliverable over the plan period. It is acknowledged that an initial amount of work (approximately one week) would need to be done to map the existing number and location of HMO’s before the policy could be applied to new ones.</p> <p>SMBC has the mapping technology and resources to for example determine the number of HMOs in an area and the percentage of HMOs within a given area.</p> <p>This buffering data exercise has been undertaken for Sui Generis /A5 uses under the Hot Food Takeaway SPD and around schools.</p> <p>SHO7 is consistent with national policy relating to safety and housing needs, ‘including of those who rent homes’ are referenced in 2023 NPPF paragraphs 63 and 96 (b), 8 (b)</p> <p>National guidance appears largely silent on planning issues relating specifically to HMO’s (apart from Licensing) and as above.</p> <div><h3>HMO's and Distance Buffers</h3><p>The tables below show the totals and percentage of each offence type occurring within a set distance of a HMO compared to the total for the entire Sandwell LA.</p><p>For example 17.9% of all ASB across Sandwell LA occurred within 0.1 miles of a HMO.</p><table><thead><tr><th>Type</th><th>0.1 mile buffer</th><th>Total for Sandwell</th><th>Percentage</th></tr></thead><tbody><tr><td>Total Recorded Crime</td><td>5,915</td><td>33,677</td><td>17.6%</td></tr><tr><td>ASB</td><td>841</td><td>4,701</td><td>17.9%</td></tr><tr><td>Arson and Criminal Damage</td><td>454</td><td>2,706</td><td>16.8%</td></tr><tr><td>Burglary</td><td>315</td><td>1,667</td><td>18.9%</td></tr><tr><td>Drug Offences</td><td>141</td><td>757</td><td>18.6%</td></tr><tr><td>Vehicle Crime</td><td>509</td><td>2,924</td><td>17.4%</td></tr></tbody></table> <table><thead><tr><th>Type</th><th>0.25 mile buffer</th><th>Total for Sandwell</th><th>Percentage</th></tr></thead><tbody><tr><td>Total Recorded Crime</td><td>16,190</td><td>33,677</td><td>48.1%</td></tr><tr><td>ASB</td><td>2,361</td><td>4,701</td><td>50.2%</td></tr><tr><td>Arson and Criminal Damage</td><td>1,202</td><td>2,706</td><td>44.4%</td></tr><tr><td>Burglary</td><td>803</td><td>1,667</td><td>48.2%</td></tr><tr><td>Drug Offences</td><td>377</td><td>757</td><td>49.8%</td></tr><tr><td>Vehicle Crime</td><td>1,365</td><td>2,924</td><td>46.7%</td></tr></tbody></table><p>The table below: covered by distance of the total area covered by the buffers</p><table><thead><tr><th>Buffer / Area</th><th>Total Covered</th></tr></thead><tbody><tr><td>0.1 mile</td><td>3.1 sq mi</td></tr><tr><td>0.25 mile</td><td>12.1 sq mi</td></tr><tr><td>Sandwell LA</td><td>33 sq mi</td></tr></tbody></table></div> | Type | 0.1 mile buffer | Total for Sandwell | Percentage | Total Recorded Crime | 5,915 | 33,677 | 17.6% | ASB | 841 | 4,701 | 17.9% | Arson and Criminal Damage | 454 | 2,706 | 16.8% | Burglary | 315 | 1,667 | 18.9% | Drug Offences | 141 | 757 | 18.6% | Vehicle Crime | 509 | 2,924 | 17.4% | Type | 0.25 mile buffer | Total for Sandwell | Percentage | Total Recorded Crime | 16,190 | 33,677 | 48.1% | ASB | 2,361 | 4,701 | 50.2% | Arson and Criminal Damage | 1,202 | 2,706 | 44.4% | Burglary | 803 | 1,667 | 48.2% | Drug Offences | 377 | 757 | 49.8% | Vehicle Crime | 1,365 | 2,924 | 46.7% | Buffer / Area | Total Covered | 0.1 mile | 3.1 sq mi | 0.25 mile | 12.1 sq mi | Sandwell LA | 33 sq mi |
| Type | 0.1 mile buffer | Total for Sandwell | Percentage | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Recorded Crime | 5,915 | 33,677 | 17.6% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ASB | 841 | 4,701 | 17.9% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Arson and Criminal Damage | 454 | 2,706 | 16.8% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Burglary | 315 | 1,667 | 18.9% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Drug Offences | 141 | 757 | 18.6% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Vehicle Crime | 509 | 2,924 | 17.4% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Type | 0.25 mile buffer | Total for Sandwell | Percentage | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Recorded Crime | 16,190 | 33,677 | 48.1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ASB | 2,361 | 4,701 | 50.2% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Arson and Criminal Damage | 1,202 | 2,706 | 44.4% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Burglary | 803 | 1,667 | 48.2% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Drug Offences | 377 | 757 | 49.8% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Vehicle Crime | 1,365 | 2,924 | 46.7% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Buffer / Area | Total Covered | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 0.1 mile | 3.1 sq mi | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 0.25 mile | 12.1 sq mi | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sandwell LA | 33 sq mi | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

¹ In 2022, data was provided from WM Police regarding criminal activities within 0.1 mile and 2.5 miles of HMOs within Sandwell’s borough boundary (October 2020 to 30th September 2021). This data indicates that there is an increase in all aspects of criminal activity in areas where HMOs are located. For example, the total recorded crime (October 2020 to September 2021) Appendix A, shows that the total crime recorded within a 0.1 mile radius was 17.6% and within a 0.25 mile radius this increased to 48.1%.

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| | <p>National crime statistics indicate that within the West Midlands region there is 6.92% total for crime recorded. Therefore, this indicates that there is a significant increase of crime recorded in areas where HMOs are located (namely 17.6%, 0.1-mile radius and 48.1%, 0.25-mile radius).</p> <p>This information is taken from the Office for National Statistics (ONS) Criminal Statistics for England and Wales (Oct 2021 – December 2021) https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/policeforceareadatatables</p> <p>West Midlands Police also provide comments to all HMO planning proposals.</p> <p>On reviewing the 2024 planning applications for large HMOs, the common concerns were as follows:</p> <ul style="list-style-type: none"> • Transient nature of HMO occupants can lead to lack of community cohesion; • Communal areas can create security issues and conflicts amongst residents, for larger HMOs, in particular if double rooms and couples; • HMO traditionally tend to increase the demand of local resources, namely police, social services (based in index of deprivation and office of national statistics); • They refer in some of their responses (e.g. DC/24/69922 and DC/24/69954) to 2023 crime analysis within 0.25mile buffer of HMOs and compared with Sandwell borough wide. The statistics also exceeds the national average. • They often refer to the number of HMO already within the area; • They refer to 'Impact Areas' where high crime and high police demand is recorded. • They reference the National Planning Framework in relation to creating safe and accessible environment where crime and disorder do not undermine quality of life or social cohesion. <p>Policy SHO8 - Education Facilities is justified as it seeks to accommodate and direct forecast increased demand for education capacity to sustainable locations.</p> <p>It is effective as it acknowledges there may be viability issues with developer contributions but will secure the maximum commensurate with policy requirements and explore options to ensure adequate capacity is provided.</p> <p>It protects existing capacity and supports enhancements to these facilities. This is consistent with national policy (2023 NPPF, paragraphs 99 a and b,100.)</p> |

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|--------------------------------|---|----------------|-------------------------------|--------------|-----------------|------------|-----------|--------------------------------|----|----|---|----|---|-------------------------------|---|----|---|----|----|
| Q7.8 | <p>It is positively prepared and consistent with national policy as it seeks to meet the identified as far as possible and the policy includes a criteria-based policy to support appropriate sites coming forward.</p> <p>The BC Gypsy and Traveller Accommodation Assessment (BC G&T AA) does provide a robust assessment of accommodation needs having been produced by RRR Consultancy using an established methodology which was consulted on which complies with policy and legislation and uses a combination of data sources including review of secondary information including Housing and Communities Traveller Caravan Count to determine trends in the population of Gypsies and Travellers; online and telephone interviews with key stakeholders providing qualitative data regarding accommodation needs of Gypsies, Travellers, and Travelling Showpeople; and extensive face to face and telephone surveys covering a range of issues related to accommodation and service needs.</p> <p>The policy isn't clear on the need figures for the plan period for Gypsy and Travellers and Travelling Showpeople and this can be made clearer, amendments are set out in Q7.8 a).</p> | | | | | | | | | | | | | | | | | | |
| Q7.8a | <p>Yes, the policy should set out identified needs for additional pitches and / or plots over the plan period. The Council proposes to update table 9 and include within the policy:</p> <p>Proposed amendments:</p> <p>2. Table 9 sets out the need for New Gypsy and Traveller permanent pitches and Travelling Showpeople plots will be provided to meet identified needs up to 2031 as set out in Table 9, in accordance with the Black Country Gypsy and Traveller Accommodation Assessment (GTAA) 2022.</p> <p>Table 9: Need and Supply of Gypsy and Traveller Permanent Pitches and Travelling Showpeople</p> <table><tr><th>Type of Supply</th><th>Proposed Supply (Allocations)</th><th>Need to 2031</th><th>Need 2031 -2041</th><th>Total Need</th><th>Shortfall</th></tr><tr><td>Gypsy and Travellers (Pitches)</td><td>10</td><td>12</td><td>6</td><td>18</td><td>8</td></tr><tr><td>Travelling Showpeople (Plots)</td><td>0</td><td>24</td><td>8</td><td>32</td><td>32</td></tr></table> | Type of Supply | Proposed Supply (Allocations) | Need to 2031 | Need 2031 -2041 | Total Need | Shortfall | Gypsy and Travellers (Pitches) | 10 | 12 | 6 | 18 | 8 | Travelling Showpeople (Plots) | 0 | 24 | 8 | 32 | 32 |
| Type of Supply | Proposed Supply (Allocations) | Need to 2031 | Need 2031 -2041 | Total Need | Shortfall | | | | | | | | | | | | | | |
| Gypsy and Travellers (Pitches) | 10 | 12 | 6 | 18 | 8 | | | | | | | | | | | | | | |
| Travelling Showpeople (Plots) | 0 | 24 | 8 | 32 | 32 | | | | | | | | | | | | | | |
| Q7.8b | <p>The policy's criteria are justified with regard to the Public Sector Equality Duty. Policy HOU4 addresses the accommodation needs of Gypsies, Travellers and Travelling Showpeople in a manner consistent with the Public Sector Equality Duty by requiring new sites to provide safe, healthy and decent living conditions, equitable access to essential services, opportunities for integration with neighbouring communities, and adequate space and utilities to support family life and cultural practices.</p> | | | | | | | | | | | | | | | | | | |

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| | <p>While these matters are also reflected in general housing and infrastructure policies, their explicit inclusion within HOU4 ensures that the particular needs of these groups are directly recognised and safeguarded, thereby advancing equality of opportunity and fostering good relations in line with statutory duties.</p> <ul style="list-style-type: none"> • Criteria (a), (b), (d), (e), (g) ensure that sites are safe, healthy, serviced and sustainable, preventing indirect discrimination by guaranteeing that Traveller sites are held to standards comparable to conventional settled housing. • Criteria (c) to facilitate integration with neighbouring communities – this aims to foster good relations and guard against segregation and promoted mutual understanding. • Criteria (f) biodiversity net gain applies equally to all residential developments. <p>The council considers that this policy doesn't treat Gypsy / Traveller communities less favourably than settled communities. It has also considered the specific needs of Gypsies and Travellers and Travelling Showpeople as referenced in criteria (d).</p> <p>There is some overlap - such as:</p> <ul style="list-style-type: none"> • Criterion b directly refers to Policy HOU2, which sets out the standards for access to residential services. • Health, safety, privacy, amenity (criterion a) overlaps with general housing quality policies (such as HOU1 on housing allocations and HOU3 on housing standards), but the reference in HOU4 is important because it tailors these expectations to Gypsy and Traveller sites. • Integration (criterion c) resonates with wider spatial and design policies that promote inclusive development and avoid segregation, but its inclusion here highlights the equality implications for Gypsy and Traveller accommodation specifically. • On-site services (criterion e) are covered in general infrastructure policies, but again, the specific mention ensures they are not overlooked for Traveller sites. <p>There may be duplication with regards to criteria (f) as this is covered in SNE2 criteria 1 which states</p> <p style="text-align: center;"><i>All development proposals in Sandwell shall deliver a minimum 10% net gain in biodiversity value when measured against baseline site information.</i></p> <p>Therefore, a modification is proposed to delete wording as follows:</p> <p>f. a minimum 10% biodiversity net gain is demonstrated in accordance with Policy SNE2;</p> <p>Criteria g) refers to Policy SCC5 - the site should not be at risk of flooding and proposals must not increase flood risk for others, in accordance with Policy SCC5. This could be considered to be a repetition and could be deleted.</p> |

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| Q7.9 | <p>Yes, NPPF paragraph 60 seeks that</p> <p><i>‘the needs of groups with specific housing requirements are addressed’.</i></p> <p>NPPG states that plan making authorities should assess the need for housing of different groups and reflect this in planning policies [Paragraph: 001 Reference ID: 67-001-20190722], also, plan making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people.</p> <p>It continues that the policies can set out how the plan making authority will consider proposals for the different types of housing that these groups are likely to require.</p> <p>The SHMA [HOU 001] considers the specific profiles of the specific groups of population and provided information on the future needs for different groups.</p> <p>Policy SHO10 is a specific policy that refers to several groups that may have specific needs and sets out criteria against which proposals will be considered.</p> |
| Q7.9a | <p>For clarity it may be helpful to include a specific reference to housing for older people, also reference to meeting identified needs and the accessibility requirement of Policy SHO5, therefore the Council propose the following changes to Policy SHO10:</p> <ol style="list-style-type: none"> 1. <i>Proposals for specific forms of housing including children’s homes, care homes, nursing homes, extra care facilities. <u>housing for older people</u>, or any other identified need, will be considered in relation to the following criteria:</i> <ol style="list-style-type: none"> a. <u>the type of specialist accommodation proposed meets identified needs:</u> b. <i>compatibility with adjacent uses;</i> c. <i>the suitability of the site and building;</i> d. <i>the potential for undue noise and general disturbance to surrounding residents;</i> e. <i>the character and quality of the resulting environment;</i> f. <i>the impact on parking provision and highway safety;</i> g. <i>accessibility by a choice of means of transport; and</i> h. <i>proximity to facilities.</i> i. <u>the proposal meets the accessibility requirements set out in Policy SHO5</u> 2. <i>Supporting information will be required ...</i> |
| Q7.9b | <p>NPPG states that plan making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled</p> |

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| | <p>people. The policies can set out how the plan making authority will consider proposals for the different types of housing that these groups are likely to require. Policy SHO10 sets out criteria for housing for people with specific needs.</p> <p>Policy SHO5 has a requirement for accessible housing, to make it clearer that this also relates to Policy SHO10, additional wording is proposed as set out in Q7.9 a).</p> |

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| Q7.10 | <p>Policy SDS1 (3) can be amended to include reference to Strategic Sites – Appendices B and C Chapter 17 and 18 show how the housing and employment land ambitions for Sandwell will be met. <u>They include Strategic Site Policies for housing and employment and mixed use and non-strategic allocations.</u> Those development needs that cannot be accommodated within the borough will be exported to sustainable locations in neighbouring local authority areas, following consultation.</p> <p>The title of Appendix B and C could be amended as follows:</p> <p>Appendix B Chapter 17 – Strategic and non-strategic housing allocations</p> <p>Appendix C Chapter 18 – Strategic and non-strategic employment allocations.</p> <p>Policy SHO1 – Table 5</p> <p>Amend table to show total capacities for each type of supply 2024-2041 and not split into timeframes, see proposal in Q7.1 (c)</p> <p>Policy SHO1 criterion 4 – amend as follows:</p> <p><i>The development of sites for housing should demonstrate <u>be delivered through</u> a comprehensive approach. , making best use of available land and infrastructure and not prejudicing neighbouring uses. Incremental development of an allocated site will only be allowed where it would not prejudice <u>the remaining parts of the site coming forward for development.</u> the achievement of high-quality design across the wider site. Masterplans and other planning documents¹⁵⁹ will be produced, where appropriate, to provide detailed guidance on the development of allocations.</i></p> <p>Policy SHO1 – addition of new criterion:</p> |

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| | <p><u>5. All new developments should be supported by the necessary on and off-site infrastructure to serve its needs, mitigate its impacts on the environment and the local community, and ensure that it is sustainable and contributes to the proper planning of the wider area.</u></p> <p>Policy SHO2 – amend as follows:</p> <ol style="list-style-type: none"> 1. <i>Proposals for residential development on sites not specifically allocated for residential use (windfall developments) will be permitted where the site is previously developed land and in accordance with other local plan policies.</i> 2. <i>Proposals for residential development on unallocated greenfield land will be resisted. Such sites will only be considered where:</i> <ol style="list-style-type: none"> a. <i>The site is not protected open space: or</i> b. <i>The site is council owned land that is deemed surplus to requirements: or</i> c. <i>The development of the site will bring an under used piece of land back into beneficial use and will not harm the environmental or ecological value of the site and the wider area, in accordance with other relevant policies in the SLP, or cause harm to the significance of heritage assets, including their setting.</i> <p>Policy SHO2 – add additional criterion 3.</p> <p><u>3. All new developments should be supported by the necessary on and off-site infrastructure to serve its needs, mitigate its impacts on the environment and the local community, and ensure that it is sustainable and contributes to the proper planning of the wider area.</u></p> <p>Policy SHO4 - amend as follows:</p> <p><i>.... Smaller sites, which could reasonably be expected to form part of a major development in the future, will also need to take this policy into account. The minimum proportion of affordable housing that should be provided, <u>subject to financial viability</u>, is.....</i></p> <p>Policy SHO5 - amend as follows:</p> <ol style="list-style-type: none"> 1. <i>All new homes will be required to meet M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations <u>except where site specific factors such as vulnerability to flooding, site topography, and other circumstances may make a specific site less suitable for M4(2).</u></i> |

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| | <p>Policy SHO9 - amend as follows:</p> <p>2. Table 9 sets out the need for New Gypsy and Traveller permanent pitches and Travelling Showpeople plots will be provided to meet identified needs up to 2031 as set out in Table 9, in accordance with the Black Country Gypsy and Traveller Accommodation Assessment (GTAA) 2022.</p> <p>Table 9: Supply of Gypsy and Traveller Permanent Pitches up to 2031 <u>Need and Supply of Gypsy and Traveller and Travelling Showpeople Permanent Pitches</u></p> <table><tr><th><u>Type of Supply</u></th><th><u>Proposed Supply (Allocations)</u></th><th><u>Need to 2031</u></th><th><u>Need 2031 - 2041</u></th><th><u>Total Need</u></th><th><u>Shortfall</u></th></tr><tr><td><u>Gypsy and Travellers (Pitches)</u></td><td><u>10</u></td><td><u>12</u></td><td><u>6</u></td><td><u>18</u></td><td><u>8</u></td></tr><tr><td><u>Travelling Showpeople (Plots)</u></td><td><u>0</u></td><td><u>24</u></td><td><u>8</u></td><td><u>32</u></td><td><u>32</u></td></tr></table> <p>4. <i>Proposals for permanent Gypsy and Traveller pitches and Travelling Showpeople plots will be assessed against the following criteria:</i></p> <p>...</p> <p><i>e. the site should be served or be capable of being served by adequate on-site services for water supply, power, drainage, sewage and waste disposal (storage and collection);</i></p> <p><i>f. a minimum 10% biodiversity net gain is demonstrated in accordance with Policy SNE2; and</i></p> <p><i>g. the site should not be at risk of flooding and proposals must not increase flood risk for others, in accordance with Policy SCC5.</i></p> <p>Policy SHO10 - amend the policy as follows:</p> <p>1. <i>Proposals for specific forms of housing including children’s homes, care homes, nursing homes, extra care facilities. <u>housing for older people</u>, or any other identified need, will be considered in relation to the following criteria:</i></p> <p><i>a. <u>the type of specialist accommodation proposed meets identified needs:</u></i></p> | <u>Type of Supply</u> | <u>Proposed Supply (Allocations)</u> | <u>Need to 2031</u> | <u>Need 2031 - 2041</u> | <u>Total Need</u> | <u>Shortfall</u> | <u>Gypsy and Travellers (Pitches)</u> | <u>10</u> | <u>12</u> | <u>6</u> | <u>18</u> | <u>8</u> | <u>Travelling Showpeople (Plots)</u> | <u>0</u> | <u>24</u> | <u>8</u> | <u>32</u> | <u>32</u> |
| <u>Type of Supply</u> | <u>Proposed Supply (Allocations)</u> | <u>Need to 2031</u> | <u>Need 2031 - 2041</u> | <u>Total Need</u> | <u>Shortfall</u> | | | | | | | | | | | | | | |
| <u>Gypsy and Travellers (Pitches)</u> | <u>10</u> | <u>12</u> | <u>6</u> | <u>18</u> | <u>8</u> | | | | | | | | | | | | | | |
| <u>Travelling Showpeople (Plots)</u> | <u>0</u> | <u>24</u> | <u>8</u> | <u>32</u> | <u>32</u> | | | | | | | | | | | | | | |

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| | <p><i>b. compatibility with adjacent uses;</i></p> <p>...</p> <p><i>h. proximity to facilities.</i></p> <p><i><u>i. the proposal meets the accessibility requirements set out in Policy SH05</u></i></p> <p><i>2. Supporting information will be required ...</i></p> |