

Sandwell Local Plan EIP: Additional Statement regarding Question 8.3 (Policy SEC4)

Respondent **Mr Greg Ball; ID number 25**

Representation ID **1328**

Inspector's Question "Are the requirements of policy SEC4 justified, consistent with national policy, and will they be effective in supporting the plan's strategic objectives 2 and 8? Is the policy appropriately flexible?"

My additional statement

I am pleased that the Inspector will consider SEC4 and hope that my representation is sufficient for the purposes of the Examination without my attendance. However, having revisited my representation in the context of the wider context of national policy, the local plan and the questions raised by the Inspector, I have additional comments.

1. The NPPF revisions published in December 2024, and subsequent Government statements give greater emphasis to using brownfield land for housing. As currently worded, despite its claims about flexibility, SEC4 forms a barrier to achieving that objective.

My original representation proposed two alternative changes to SEC4 to make it more effective. Given the greater emphasis on brownfield housing, it may be preferable to combine these options to give a firmer steer to decision-making. Divide the allocated sites into those where comprehensive redevelopment for housing would be preferred and those where more weight should be given to continued employment use. In the case of the 'housing-first' sites, clauses 2a and 2b of SEC4 would not apply; these clauses would be retained for 'employment-first' sites. This distinction would give more certainty to those considering investment in either industrial or housing development.

2. My representation failed to mention the further protection against inappropriate development on SEC4 sites provided **SDM9 - Community Facilities** as follows:

"b. Proposals for new community facilities on land or premises identified under Policy SEC4, which are either currently or formerly in employment use, will be resisted; applicants wishing to reuse such buildings or sites will need to meet the criteria set out in that policy and be able to demonstrate why the site is no longer suitable for employment use now or in the future." This may be duplication of SEC4 to some extent, but it does make clear a type of development not considered appropriate on SEC4 sites.

End of comment.