## Sandwell Local Plan 2024-2041 - Examination

**Inspector** 

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## MATTERS, ISSUES AND QUESTIONS for Hearing Week 3

Matter 13: Plan Delivery and Housing Land Supply

Issue 13 – Whether the plan will provide for a sufficient housing land supply to deliver the planned scale of housing growth over the plan period and whether a deliverable five-year supply of housing will be available on adoption.

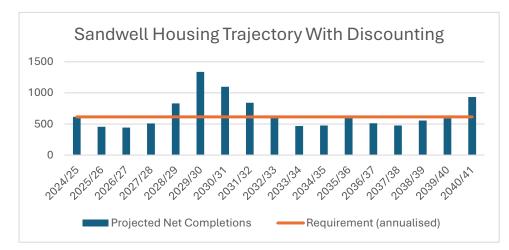
- **Q13.1** Is there convincing evidence to demonstrate that:
  - a. The plan's housing requirement to 2041 will be met;
  - b. There will be a five-year supply of deliverable land for housing following adoption of the plan with appropriate buffer applied; and
  - c. There is a reasonable prospect of a five-year supply of deliverable land for housing being maintained throughout the plan period.
- **Q13.2** Is the plan's allowance for small windfall sites justified and supported by compelling evidence?
- **Q13.3** Overall, does the plan include appropriate arrangements for implementation, monitoring, and review?
- Q13.4 In terms of this issue, are any main modifications necessary for soundness?

## Qn. No. Response

Q13.1a Policy SHO1 criteria 1 sets the housing requirement of 10,434 between 2024 – 2041.

The housing supply has been updated and includes proposed allocations, sites with planning permission not allocated, small windfalls, additional floorspace in centres and Wednesbury Master Plan. 615 homes were completed 2024-2025. The total supply identified is 10,725 homes (with discounting applied). If discounting is not applied, the supply is 11,609 homes. Therefore, the housing requirement will be met. A list of all sites is attached for information.

A housing trajectory is set out below, with discounting applied:



And with no discounting:



Q13.1b The below table demonstrates that the Council have a five-year supply including the appropriate buffer of 20%. The supply is made up of 23% sites under construction, 53% sites with planning permission: 22% allocations without planning permission and 1% other commitments. A table of the sites within the five-year supply is attached for the Inspector's information.

Qn. No.	Respo	onse		
				Notes
	Α	Annual Requirement	614	10,434 / 17
	В	Five-year requirement	3070	A multiplied by five
	С	Plus 20% buffer (Sandwell	614	Sandwell's most recent HDT is 44%
	Е	Total five-year requirement	3684	C plus E
	F	Annualised requirement	736.8	F divided by five
	G	Housing supply 2025 - 2030	3786	
		Supply in years	5.14	G divided by F
Q13.1c	The Council have identified sufficient sites to meet the total housing requirement and will continue to monitor housing supply on an annual basis. The council considers that there is a reasonable likelihood that the homes will be built and that the five-year supply can be maintained throughout the plan period.			

Qn. No.	Response					
Q13.2	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.					
	As Sandwell is an urbanised area it is difficult to identify all potential redevelopment proposals that may arise. This is why an allowance has been made for windfall development. Only sites of ten homes or more are allocated in the plan, therefore sites of nine homes or less are reflected in the windfall allowance.					
	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.					
	Year Completed	Total Housing Completions	No of Windfall Completions	%		
	2011/2012*	599	153	26%		
	2012/2013*	712	109	15%		
	2013/2014*	536	120	22%		

Qn. No.	Response			
	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	
	Therefore, the council are confident that the supply identified as a windfall allowance will be delivered.			

Qn. No.	Response
Q13.3	Yes, the plan includes appropriate arrangements for implementation, monitoring and review.
	Following its adoption by full council the SLP will be used to determine applications for planning permission in accordance with Section 38 of the Planning and Compulsory Purchase Act 2004 unless material considerations indicate otherwise. Sandwell Council has an ambitious pipeline of regeneration projects worth £3 billion, which it takes an active role in supporting the delivery of and will assist with meeting the development targets set out in the SLP.
	Chapter 16 of the SLP sets out performance indicators that will be monitored to assess whether policies are performing effectively and if the council should commence an early review of the plan. The indicators are 'SMART' (specific, measurable, achievable, relevant, and time-bound), linked to specific policies within the plan and are arranged in plan order. The council is legally required by Section 35 of the Planning and Compulsory Purchase Act 2004 to publish an Authority Monitoring Report on an annual basis. The AMR will be the medium through which the council reports on the performance of indicators set out in the SLP.
	The SLP is bound to the transitional arrangements set out at paragraph 236 of the December 2024 version of the NPPF as the housing requirement in the SLP meets less than 80% of local housing need. This means that the local planning authority will be expected to begin work on a new plan under the revised plan-making system as soon as the relevant provisions are brought into force which Government has indicated will be by the end of 2025.
	The February 2025 Local Development Scheme (MON 001) timetables a review of the Sandwell Local Plan Policies and allocations to commence in January 2026. The review is expected to occur concurrently with the preparation of a new Spatial Development Strategy, which is expected to cover Sandwell and the six other constituent authorities within the West Midlands Combined Authority area.

Qn. No.	Response
Q13.4	Should the Inspector wish to recommend any modifications, the Council would be pleased to receive them.