

This matter is being dealt with by
Jack Randall-Barsby

No 1 Colmore Square
Birmingham B4 6AA
DX 721090 Birmingham 43
T: +44 (0)121 214 0000

Ministry of Housing, Communities and Local
Government,
Planning Casework Unit,
23 Stephenson Street,
Birmingham,
B2 4BH

Our ref: 1249803.61.JRB

10 September 2025

BY EMAIL ONLY:

PCU@communities.gov.uk

Dear Sirs

THE BOROUGH COUNCIL OF SANDWELL (CRANFORD STREET, SMETHWICK) COMPULSORY PURCHASE ORDER 2025 ("the Compulsory Purchase Order")

Our client: South Staffordshire Water PLC ("SSW")

Objection in response to notice of making the Compulsory Purchase Order pursuant to Section 226(1)(a) of the Town and Country Planning Act 1990 and the Acquisition of Land Act 1981

This letter is an objection to the Borough Council of Sandwell (Cranford Street, Smethwick) Compulsory Purchase Order 2025 (the "**Compulsory Purchase Order**") as submitted by the Borough Council of Sandwell (the "**Council**") in order to authorise the Council to carry out the proposed redevelopment of approximately 100 new homes including 25% affordable homes and one commercial unit (the "**Scheme**") on land more particularly delineated on the attached sealed order map (Appendix 1). This is in response to the letter sent by the Council to South Staffordshire Water PLC ("**SSW**") dated 21st August 2025 which enclosed the notice of the making of The Compulsory Purchase Order.

Our client has an interest in the operational apparatus owned by SSW in the vicinity of the Scheme but our client has been given no further detail in relation to the Compulsory Purchase Order or the potential impact on its operational assets. In terms of responding to this objection then please address any correspondence to Jack.Randall-Barsby@shma.co.uk. Alternatively, the postal address is as set out at the top right of this letter.

SSW is a water undertaker appointed under the Water Act 1989, with statutory duties to carry out water supply functions throughout its appointed area. SSW operates assets that are located within the proposed Scheme. SSW does not object in principle to the Scheme but reserves its position in relation to the specific impact that it will have on its operations and assets. Such SSW apparatus is strategic and operational. SSW has no other options to serve the local areas if there is a loss of supply due to the Scheme. Accordingly, it is essential that SSW's assets remain in continuous operation in order to ensure the provision of water supplies to household and non-household customers.

Any works required to be carried out on SSW's assets must be planned and implemented to avoid risk of supply interruption or damage to the integrity of the water network. SSW therefore objects to the Compulsory Purchase Order unless and until such time as an approved programme and methodology of works is agreed. In addition, given that there has been no consultation between the Council and our client to date, we reserve the right to make further representations in the event that it becomes apparent that the Scheme will have an adverse impact on our client's operational apparatus.

Please note that SSW's objection will remain unless and until either SSW is satisfied that the Compulsory Purchase Order will not adversely impact on its assets, or alternatively, an asset protection agreement is secured. With the above in mind, the Council should now engage quickly and meaningfully with our client so as to ensure that our client's statutory apparatus is adequately protected.

We would be grateful if you could acknowledge receipt of this objection.

Yours faithfully

Shakespeare Martineau LLP

Direct Line: 0121 237 3084

Direct Fax: 0121 237 3011

E: jack.randall-barsby@shma.co.uk

Encs

Map referred to in The Borough Council of Sandwell (Cranford Street, Smethwick) Compulsory Purchase Order 2025

Dated the 13th day of August 2025

The COMMON SEAL of SANDWELL METROPOLITAN BOROUGH COUNCIL was hereunto affixed in the presence of

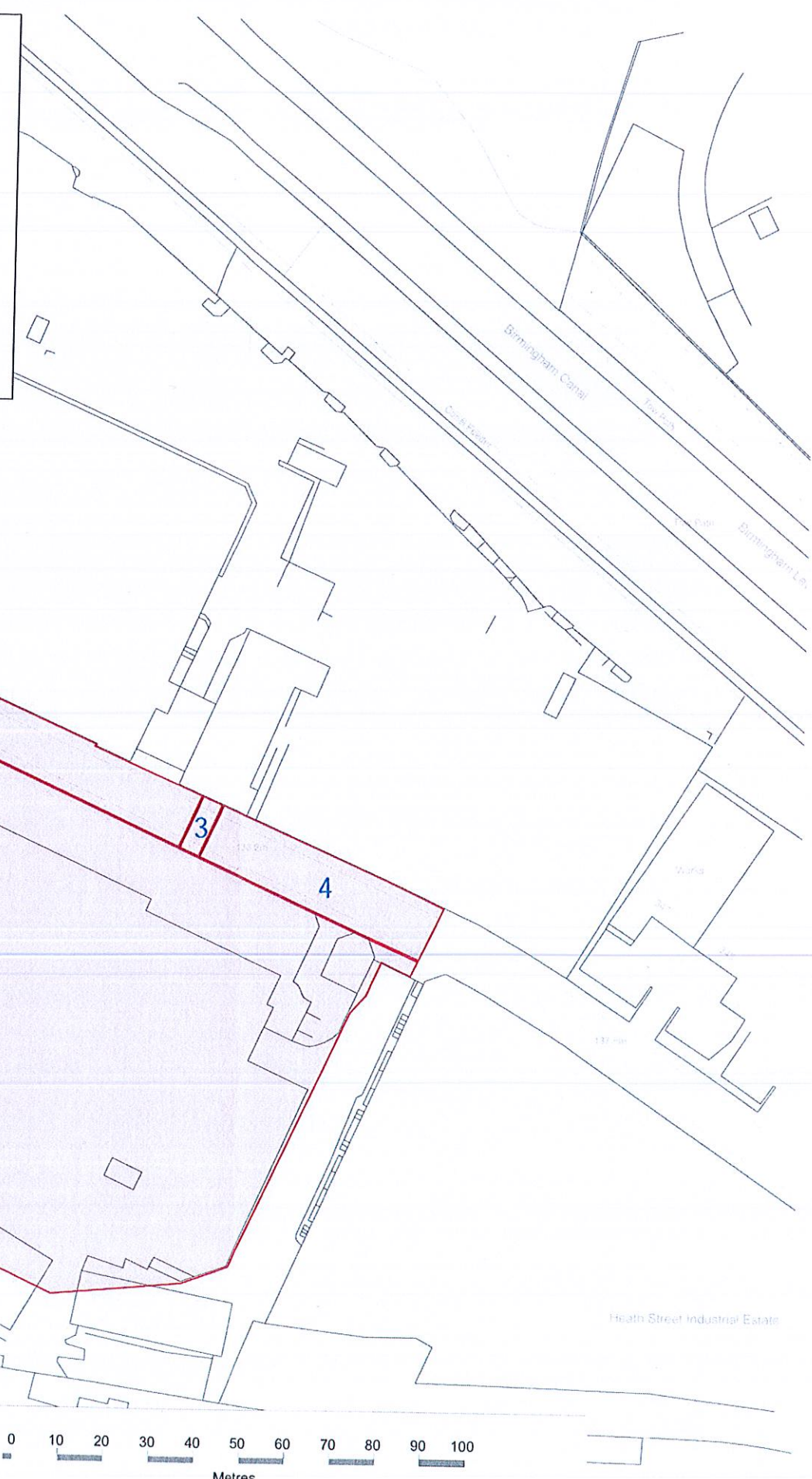
62211

CAW
caiver

SERVICE MANAGER - LEGAL
(Authorised Signatory)

Name of Authorised Signatory:

Position Held:



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Birmingham
B2 5DB

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Key:
 Land to be acquired

Business Unit: Land Referencing			Status: Final		
Approved By AMU	Date Approved 29/07/2025	Checked By JWY	Date Checked 29/07/2025	Drawn By CKY	Date Drawn 29/07/2025

Title:
Map referred to in The Borough Council of Sandwell (Cranford Street, Smethwick) Compulsory Purchase Order 2025

Date of Issue: 29/07/2025	Project Code: 401-0129	Scale: 1:1,250 @A3
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Drawing Reference: 401-0129_000003	Version: 4.0
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