

Draft Sandwell Local Plan

Regulation 18 Consultation

Spatial Strategy Paper

November 2023

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1 Sandwell Local Plan Spatial Strategy and Options

Introduction

- 1.1. A key part of the preparation of any local plan is to define a strategy to help identify where new development would best be located. A spatial strategy - or development strategy as it is sometimes called – sets out a template for development in an area, indicating where it should be located to help achieve sustainable growth. It aims to focus growth in the right places, to help balance the need for development with the need to protect and enhance the environment and to help meet other plan objectives.
- 1.2. This document is intended to set out the basis for the Sandwell Local Plan's (SLP) approach to growth in terms of the location and broad distribution of development between different parts of Sandwell, and between brownfield and greenfield sites. It also identifies the various spatial options that have been considered as part of the Local Plan's development.
- 1.3. This paper supports the first statutory stage of preparing the draft Sandwell Local Plan, known as the Regulation 18 stage. The identification and refinement of a strategy such as this one is an iterative process, especially as local plans are subject to public consultation, and it is likely to evolve and change during the production of the SLP, up to the point of adoption. This would include any subsequent changes to national policy, the identification of key issues and any additional relevant evidence that has been produced to guide the draft policies or approach in the SLP.
- 1.4. It will be necessary to make choices about how Sandwell grows over the period 2025 - 2041 to best meet social, economic and environmental aims. This will require us to consider a range of factors and objectives, and how different patterns of land use and development might influence or affect their delivery.

National policy

- 1.5. National policy is set out in the National Planning Policy Framework¹ (the NPPF) and various planning Acts of Parliament; it is supported by accompanying national Planning Practice Guidance² (PPG) and other national guidance and legislation, including on transportation, design, climate change and the natural and historic built environment.
- 1.6. The Local Plan is a statutory requirement (Section 62(1) Planning and Compulsory Purchase Act 2004) and the Government has made it clear that all local authorities must have an up-to-date Local Plan.
- 1.7. At a national level, the NPPF is clear that the purpose of the planning system is to contribute to the achievement of sustainable development. It requires that economic, social and environmental objectives are pursued at the same time through Local Plans, which then provide a positive vision for

¹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² <https://www.gov.uk/government/collections/planning-practice-guidance>

the future of their areas, together with locally-focussed planning policies that play an active role in guiding development towards sustainable solutions.

- 1.8. As part of producing a local plan, national guidance also requires local authorities to identify all reasonable options for the overall levels of growth, the spatial strategy and site allocations that are being included in the new plan. Site assessment work then enables authorities to develop an emerging preferred strategy, which will inform the scale, location and form of new development in the district.
- 1.9. As part of this, and to ensure that the most appropriate sites are chosen, there is a need to test alternative housing, employment and other land use allocations. This is also in accordance with the Sustainability Appraisal³ work that is needed to ensure a plan is sound. The Sustainability Appraisal also needs to assess realistic options to the development sites chosen, based on identifying the most sustainable and least damaging locations for development when considered against a range of objectives. These are termed “*reasonable alternatives*”.
- 1.10. Currently, national planning policy requires local plans to be examined in public to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. The soundness tests include reference to the plan being justified – this means that it includes “*an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence*”.
- 1.11. In December 2022, the Government published a consultation on proposed changes to the current planning system, some of which would have an impact on the production of local plans if enacted, including in terms of how the plan is justified and how it has been prepared in consultation with neighbouring councils (the Duty to Co-operate).
- 1.12. There is however an accompanying acknowledgement in the consultation that local plans currently in preparation (such as the SLP) should continue to be produced and assessed through the existing system, provided they can be adopted by 2025. This means that as far as the SLP is concerned, it will still be subject to the four tests of soundness⁴ and the Duty to Co-operate.

Local considerations

- 1.13. In determining the spatial strategy for the Sandwell Local Plan, we must balance sometimes-conflicting elements to ensure we produces a plan that is sound enough to be tested by an independent Planning Inspector. The final choice of spatial strategy for the SLP will also need to take account of the following:
 - a) Known environmental and other planning constraints

³ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁴ Positively prepared: plan is based on a strategy that seeks to meet objectively assessed development and infrastructure requirements;
justified: plan is the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence;
effective: plan is deliverable over its timeframe based on effective joint working on cross-boundary strategic priorities;
consistent with national policy: plan enables the delivery of sustainable development.

- b) Evidence base;
- c) Plan vision and objectives;
- d) Consultation feedback;
- e) Ongoing engagement with key stakeholders, including adjoining local authorities;
- f) Testing of options through:
 - i. the Sustainability Appraisal (SA) process, which incorporates Strategic Environmental Assessment (SEA) and
 - ii. a Habitats Regulations Assessment⁵ (HRA);
- g) Consideration of land availability, viability and existing / future infrastructure capacity; and
- h) Other plans and strategies affecting Sandwell.

Equality

1.14. An Equalities Impact Assessment⁶ has been carried out for the Issues and Options document and further iterations will be completed at later stages of the plan's production. This ensures that any impacts likely to affect local communities / groups / individuals can be considered when decisions are made on the content and direction of the Local Plan.

Social Value

1.15. The Local Plan will play an important part in delivering the spatial and land use aspects of the Council's Vision 2030, particularly as it relates to housing, employment, transport, environment and education goals.

Incorporating policies from the Draft Black Country Plan

1.16. Prior to the agreement by the Association of Black Country Authorities (ABCA) to no longer pursue the delivery of the Black Country Plan, the four Black Country councils had produced a series of policies and proposals to form the basis of the draft Black Country Plan. Where relevant and appropriate, these policies and their supporting evidence will be incorporated into the emerging SLP and we will ensure they are suitably up-to-date and backed by the latest information and guidance.

Background to Sandwell Local Plan

1.17. The four Black Country Authorities worked together to produce the Black Country Core Strategy, which was adopted in 2011 and which runs to 2026. The existing Core Strategy provides the framework for various Site Allocation Documents and Area Action Plans, which themselves set out local policies and site allocations for individual authority areas. The four councils worked on a replacement for the Core Strategy, called the Black Country Plan, until October 2022.

⁵ <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

⁶ <https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty>

- 1.18. At its meeting on 19th October 2022, ABCA formally decided to halt the preparation of the Black Country Plan (BCP). As a result, the four Black Country authorities proceeded with the preparation of individual Local Plans as soon as was practical. The decision to halt the production of the BCP, together with the age and status of Sandwell's Tier 2 Plans (and associated documents), meant that Sandwell needed to commence a full review of its Local Plan as a matter of urgency.
- 1.19. Because of this decision, on 16th November 2022 Cabinet gave approval for the preparation of a single-tier Local Plan covering the whole of Sandwell, which on adoption will replace the following:
- Black Country Core Strategy (2011-2026)
 - Sandwell Site Allocations & Delivery Development Plan Document (2012-2021)
 - West Bromwich Area Action Plan (2012-2026)
 - Smethwick Area Action Plan (2008) *
 - Tipton Area Action Plan (2008) *
- * These AAPs, however, were largely absorbed into the SAD on its adoption, and will be superseded fully by the new Sandwell Local Plan (as they would have been by the BCP)
- 1.20. The proposed timetable for producing the Plan is set out in the published Local Development Scheme (LDS), which was also approved at the Cabinet meeting of the 16th November 2022.

Sandwell Spatial Portrait - the context for the SLP

- 1.21. Sandwell is a multi-centred metropolitan borough and forms part of the West Midlands conurbation. The district comprises six historic former boroughs:
- Oldbury
 - Rowley Regis (including the town centres of Blackheath and Cradley Heath)
 - Smethwick (including the town centres of Bearwood and Cape Hill⁷)
 - Tipton (including the town centre of Great Bridge)
 - Wednesbury
 - West Bromwich
- 1.22. All these former boroughs contain numerous smaller settlements and localities, each with their own distinct identities. West Bromwich is designated as Sandwell's Strategic Town Centre and is the largest town in the borough, while Sandwell Council House (the headquarters of the local authority) is situated in Oldbury. In 2019 Sandwell was ranked 12th most deprived of England's 317 local authority areas.
- 1.23. Sandwell is bordered by the cities of Birmingham and Wolverhampton and the metropolitan boroughs of Dudley and Walsall. Spanning the borough are the parliamentary constituencies of West Bromwich

⁷ The use of the term '*town centre*' in this context refers to the modern centres in a planning sense. The historic centre of Smethwick, the area along the High Street, continues to be referred to as the Town Centre locally.

West, West Bromwich East, Warley and part of Halesowen and Rowley Regis, which crosses into the borough of Dudley.

Environment

1.24. The borough covers an area of 86 square kilometres. Of this area, around 20km² are identified as various types of open space, both unrestricted (parks, community open spaces etc.) and restricted (allotments, some sports fields etc.). Many of these sites also contain further designations, such as local nature reserves, sites of importance for both local and regional nature conservation, Green Belt, waterways and green corridors.

Demographic and economic background

- 1.25. The 2021 Census estimates that Sandwell has 341,900 residents, a rise of 11.0% since 2011. This compares with a rise of 6.3% in England and Wales. This 11% rise is the highest recorded in the West Midlands Metropolitan County area, the next highest being in Coventry (8.9%). In 2021, Sandwell ranked 27th for total population out of 309⁸ local authority areas in England, moving up six places in a decade. The borough's population is predicted to grow at a faster rate than both the population of the West Midlands and the national average and is forecast to increase by 30,000 between 2016 and 2030.
- 1.26. This area is the second-most densely populated local authority area across the West Midlands (after Birmingham)⁹.
- 1.27. Sandwell has a young and diverse population, with more than 40% of its residents under the age of 30, compared to around 30% elsewhere in the UK; almost 40% of residents are from an ethnic minority background, making the population more diverse than the regional and UK average of 18.8% and 14% respectively.
- 1.28. **Health** - the health of people in Sandwell does not on the whole compare well with England averages. Sandwell is one of the 20% most deprived districts / unitary authorities in England and around 25.5% (18,495) of its children live in low income families. Life expectancy for both men and women is lower than the England average; 76.1 years for men and 80.7 years for women compared to 79.4 years (male) and 83.1 years (female) nationally¹⁰. Life expectancy inequality also exists within Sandwell itself – life expectancy is 8.6 years lower for men and 8 years lower for women in the most deprived areas of the borough compared to the least deprived areas¹¹.
- 1.29. **Economy and Skills:** Sandwell has a long industrial history, especially in manufacturing. Until the 1980s the Black Country, together with neighbouring Birmingham, was the powerhouse of Britain's

⁸ Local government restructuring in Cumbria, North Yorkshire and Somerset took effect from 1 April 2023. Elections to new shadow unitary authorities in these areas were held in May 2022. As of 1 April 2023, there are 21 county councils, 164 district councils and 132 single-tier authorities, making a total of 317 local authorities in England. Source - Commons Library Research Briefing, 7 October 2022

⁹ <https://www.ons.gov.uk/visualisations/censusareachanges/E08000028/>

¹⁰ Public Health England - <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132696/ati/402/iid/90366/age/1/sex/1/cat/-1/ctp/-1/yrr/3/cid/4/tbm/1>

¹¹ Public Health England - <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e08000028.html?area-name=sandwell> (2019)

manufacturing economy. The West Midlands was one of the hardest hit parts of the UK during the collapse in the economy in the first wave of the Covid-19 pandemic¹².

- 1.30. Sandwell borough is almost the same size in population terms as Nottingham and is bigger than Newcastle on Tyne, Oxford, and Milton Keynes, but those locations all have larger economies than Sandwell.
- 1.31. Sandwell has many growing and productive businesses and a higher than average proportion of its businesses are small, but residents are not always able to take up opportunities related to those employment and economic activities. Local businesses will often need a highly skilled workforce to be able to grow to meet modern demands; that workforce needs training and support to help deliver and accelerate innovation. Sandwell also has a limited amount of the type of high-quality land needed to enable businesses to expand and grow in the borough's industrial core.
- 1.32. **Productivity** - Sandwell's Economy (Gross Value Added) was worth £6.644 billion in 2020¹³, which represents a value of £20,192 per head. While lower than both the West Midlands Metropolitan Area and the UK averages, Sandwell's productivity is higher than that of the other three Black Country authorities.
- 1.33. **Business Population** - Sandwell has around 11,600 active business units¹⁴: -
- 9,585 (82.6%) are micro businesses;
 - 1,970 (17.5%) are Small and Medium Enterprises; and
 - 50 (0.4%) are large units.
- 1.34. Of these businesses, only 40 are designated as '*high growth*' enterprises¹⁵. There is however evidence of a considerable entrepreneurial spirit in the area, with approximately 1,775 new businesses being created and 915 shutting down annually.
- 1.35. **Economic Activity** - In Sandwell, 71% of employees work full time, with 29% working part time¹⁶. The challenge for maintaining positive economic growth in Sandwell (and the wider Black Country) is to keep a positive forward momentum, particularly in light of the Covid-19 pandemic, and ensuring growth is sustainable.

¹² The West Midlands showed the largest negative growth in GDP in Quarter 2 2020 when compared with the same quarter a year earlier, at 24.7%; Source: ONS

<https://www.ons.gov.uk/economy/grossdomesticproductgdp/bulletins/gdpukregionsandcountries/apriltojune2020>

¹³ Black Country Consortium Economic Intelligence Unit -

<https://app.powerbi.com/view?r=eyJrjoiZGVkYjYzODMtN2Q0Ny00N2I3LWFiZmItZDE2OWZhOWI4OGViliwidCI6ImNhM2RjZDRiLTRiNDU0tNGUyMi1iODFhLWQ5NmZmZDZVhOGM5ZSJ9>

¹⁴ NOMIS – Business Counts 2022 <https://www.nomisweb.co.uk/reports/lmp/la/1946157189/printable.aspx>

¹⁵ A business with average annualised growth greater than 20% per annum over a three-year period is considered a high-growth enterprise. Growth can be measured by the number of employees or by turnover (*Eurostat – OECD Manual on Business Demography Statistics*).

¹⁶ Census 2021

- 1.36. A range of ongoing challenges exist for maintaining positive economic growth in Sandwell; fundamentally in sustaining the status quo and where possible keeping a positive forward momentum. Two factors that have had a major underlying legacy effect on Sandwell's economy were:
- the global financial crisis of 2007-2008, which reduced access to private sector finance;
- followed by:
- a sustained period of public sector austerity beginning in 2010; this reduced both the overall ability of local government to protect vulnerable communities and reduced their capacity to spend locally on projects that helped deliver economic growth to businesses and better prospects of employment and skills to residents.
- 1.37. During the early 2020s a range of economic shocks (including the Covid-19 pandemic, the UK's exit from the EU market in 2020, higher inflation and a more volatile energy and commodity market ensuing from the Russian invasion of Ukraine in 2022) have resulted in challenges for businesses of all sizes; while other significant changes to the economy have occurred through changes in working pattern such as a significant rise in the number of Sandwell residents now working from home.
- 1.38. It is within the context of this ongoing period of economic instability that the SLP is being developed. In effect this means that the underlying resilience of the local economic base has been through a significant period of disruption. In terms of its approach, Sandwell Council has had to prioritise a range of measures that have helped to mitigate the impacts of the current cost of living crisis on both local communities and businesses. Ensuring economic growth remains sustainable is a major priority for future development in Sandwell and the SLP provides a key part of that process providing the right sites and most viable policies for economic growth.

Employment and unemployment (April 2022-March 2023)

Economic Activity	Sandwell Nos.	Sandwell %	West Midlands %	Great Britain %
Economically Active	151,100	69.1	77.5	78.4
In Employment	142,000	64.7	73.6	75.5
Employees	125,100	57.3	64.9	66.0
Self-Employed	16,300	7.0	8.4	9.2
Unemployed	9,100	6.0	4.8	3.6

NOMIS (*Employment and unemployment figures for April 2022 to March 2023*)

1.39. Over the same period, NOMIS identified 64,400 residents (30.9% of residents aged 16 - 64) were economically inactive (compared with 21.6% in Great Britain)¹⁷.

Economically Inactive (age 16-64)	Sandwell Nos.	% of overall workforce
Total Inactive	64,400	30.9%
Students	11,700	18.2%
Looking After Family / Home	18,600	28.9%
Long-Term Sick	20,500	31.8%

- 1.40. 6% of the working population are classed as unemployed¹⁸ (as a proportion of economically active residents), with 14.2% of households classed as 'workless'¹⁹ (where households contain at least one person aged 16 to 64 and where no-one aged 16 or over is in employment).
- 1.41. Gross weekly incomes are below the national average, with the Sandwell median average wage for full-time workers being £549 per week compared to a national average of £642²⁰.
- 1.42. **Qualifications and Skills:** 27.2% of the Sandwell working age population are graduates or hold a Higher National Diploma (HND). This is 37.6% lower than the UK average rate of the equivalent forming the most highly skilled band of National Vocational Qualification (NVQ) level 4 or above; as a result, Sandwell has a smaller pool of workers able to compete for more highly skilled vacancies. 11.5% of the Sandwell working age population have no qualifications at all, which is 74% higher than the UK average. This means that the Sandwell workforce are more likely than those in the rest of the UK to work in lower skilled occupations.
- 1.43. **Employment:** In terms of job numbers, the three main employment sectors in Sandwell are retail and wholesale, manufacturing and health and social care. In terms of critical or Sandwell-specific sectors, where Sandwell plays a stronger or more disproportionate role within the wider economy than the national average, the highest contributors are manufacturing (+111% greater than the national average); electricity, gas and air conditioning (+100% greater); water supply and waste management (+71% greater); transportation and storage (+59% greater); and retail and wholesale (+40% greater)²¹.

¹⁷ NOMIS Economic inactivity (April 2022 – March 2023) - <https://www.nomisweb.co.uk/reports/lmp/la/1946157189/report.aspx?town=Sandwell#tabempunemp>

¹⁸ NOMIS – Employment and unemployment (April 2022 – March 2023)

¹⁹ NOMIS - Workless Households (Jan-Dec 2021)

²⁰ NOMIS – Earnings by place of residence (2022) <https://www.nomisweb.co.uk/reports/lmp/la/1946157189/printable.aspx>

²¹ Source – Business Growth Team, Sandwell MBC

Sandwell Economic Sectors	Workers	% of workers	Compared to UK average
Wholesale, Retail & Vehicle Repair	25,000	20.2	+40%
Manufacturing	20,000	16.1	+111%
Health & Social Care	16,000	12.9	-6%
Transportation & Storage	10,000	8.1	+59%
Education	10,000	8.1	-8%
Admin & Support Services	9,000	7.3	-18%
Construction	7,000	5.6	+14%
Accommodation & Food Service	6,000	4.8	-36%
Professional, Scientific & Technical	5,000	4.0	-55%
Public Administration & Defence	3,500	2.8	-39%
Other Service Activities	3,500	2.8	+32%
Arts, Entertainment & Recreation	2,500	2.0	-13%
Real Estate	2,500	2.0	+11%
Water Supply & Waste Management	1,500	1.2	+71%
Information & Communication	1,500	1.2	-73%
Finance & Insurance	1,250	1.0	-72%
Electricity, Gas & Air Conditioning	1,000	0.8	+100%

1.44. **Workforce and travel to work:** each day, 59,000 people come into Sandwell from neighbouring areas to work, and almost 62,000 of Sandwell's residents work outside the Borough. The job density per working age population is 0.63, versus 0.80 in the West Midlands Metropolitan area, and 0.84 in the UK.

2 Sandwell's Corporate Plan Objectives

- 2.1 The main purpose of our Corporate Plan 2021 - 2025²² is to support the delivery of a healthier, more successful future for the people of Sandwell. This will involve working closely with residents, businesses and other stakeholders to deliver improved opportunities in economic, social and environmental circumstances and protect and enhance people's life chances across the borough. It identifies several proposed outcomes that would indicate success:
- **Best start in life for children and young people** – the Local Plan helps to develop policies that will contribute to the delivery of facilities, services and opportunities for children and young people.
 - **People live well and age well** - Health and wellbeing is a key theme addressed throughout the documents of the Local Plan. It will promote healthy living and create opportunities for active lifestyles and healthy transport choices including walking, cycling and outdoor recreation.
 - **Strong resilient communities** – The Local Plan will build in effective community involvement and will be important to local communities.
 - **Quality homes in thriving neighbourhoods** – the Local Plan will play an important part in delivering the spatial and land use aspects of the Council's Vision 2030, particularly as it relates to housing, employment, transport, environment and education goals.
 - **A strong and inclusive economy** - The Local Plan will provide the regeneration framework for future investments and projects.
 - **A connected and accessible Sandwell** - Sustainability is a key theme addressed throughout the documents of the Local Plan. They will help to deliver sustainable, prosperous communities, an integrated transport network and reduce the need to travel by car.
- 2.2 The SLP is an important document that can help to deliver the spatial aspects of the Corporate Plan, by shaping the pattern, type, character and location of growth in the Borough.

Considerations

- 2.3 The following summarises the key strategic challenges that have arisen since the Black Country Core Strategy was adopted in 2011. These form the main opportunities and challenges that the emerging spatial strategy, objectives and suite of policies and proposals will seek to address:

- **Tackling climate change**

Climate change and protecting and enhancing the environment - the Plan needs to address the challenge of mitigating and adapting to the impacts of climate change in ensuring sustainability principles are embedded across all areas.

²² https://intranet.sandwell.gov.uk/downloads/file/13179/corporate_plan_2021-2025

- 2.4 In March 2020 Sandwell Council declared a Climate Emergency. Council Members agreed that greenhouse gas emissions needed to be reduced to a level compatible with keeping global warming below 1.5°C above pre-industrial levels. To achieve that, the Council committed to becoming carbon neutral in its own activities by 2030 and to seeing Sandwell become a carbon neutral borough by 2041.
- 2.5 The emerging SLP will need to address this through adopting a suite of policies designed to help Sandwell mitigate and adapt to the changing climate at a strategic level, in line with the Council's adopted Climate Change Strategy. Climate change will also be a cross-cutting theme for the SLP, and every opportunity will be taken to address appropriate mitigation and adaptation across all our topic areas.

- **Housing need**

Providing good quality housing that meets the needs of a growing population - the Plan needs to identify sufficient land for housing to meet the needs of people who are likely to live in the area over the period of the plan.

- 2.6 There is still, despite the number of housing sites that have been identified and allocated, a shortfall in the numbers of houses that need to be built to meet identified needs. Housing need is calculated using the Government's standard method based on household growth projections.
- Sandwell needs to identify land for **29,773 homes by 2041**.
 - The supply of suitable residential land based on the most recent evidence stands at **11,167 homes**.
 - We have an unmet need for **18,606 homes**.
 - We can meet just one third of our housing need on the land we know is available.
- 2.7 There will be several options for dealing with this, but the main issue remains the lack of available land suitable for housing.
- 2.8 We have a finite supply of land readily available for development and it is very likely that we cannot meet all our housing need within Sandwell itself. We will speak to adjacent councils about accommodating some of Sandwell's unmet need through the Duty to Co-operate; however, we appreciate that many Councils are in a similar position.

- **Creating healthy communities**

Health and Wellbeing - The role of the environment in shaping the social, economic and environmental circumstances that determine health and wellbeing is increasingly recognised and understood. The SLP will need to address this.

- 2.9 Sandwell is a borough with high levels of poor health and deprivation and a lower than average life expectancy. The people of Sandwell experience significant inequalities in health when compared to the rest of England. On average, they do not live for as long as people in other areas of England and spend more of their lives ill or disabled.

- 2.10 The largest influences on physical and mental health are the social determinants of health, for example, education, employment, social networks, housing, access to blue and green spaces and active modes of travel. Therefore, the SLP will look to plan the right development in the right places so that these aspects can be positively impacted.
- 2.11 Health and wellbeing is a cross-cutting theme that will be addressed throughout the Local Plan. The SLP will promote healthy living and create opportunities for active lifestyles and healthy transport choices including walking, cycling and outdoor recreation. Later stages of the plan will be accompanied by a Health Impact Assessment.

- **Thriving towns**

Supporting strong and competitive centres - to address the health and enhance the vitality and viability of our centres and ensure we have realistic ambitions for growth.

- 2.12 In recent years patterns of shopping have changed radically and perhaps permanently in some cases, predominantly due to the rise in online shopping and the impacts of the Covid-19 pandemic. The role of centres is increasingly moving away from their traditional primary functions. While there will clearly remain demand for in-person shopping and retail-related activities, centres will also need to provide additional draws / opportunities (such as for leisure, education, community uses and recreation) to offset the loss in shopping-related footfall and to help retain their vitality and viability.
- 2.13 The Plan should provide a flexible policy framework to allow centres to serve the future growth identified in Sandwell (particularly housing and employment), diversify and provide strict tests to defend against proposals that could undermine centres, such as out-of-centre developments.

- **Supporting Sandwell's economy**

Supporting a resurgent economy, which provides access to employment and opportunities for investment - the Plan should provide for a range of employment sites capable of meeting a wide variety of investment needs.

- 2.14 In terms of job numbers, the three main employment sectors in Sandwell are retail and wholesale, manufacturing and health and social care. Sandwell plays a stronger or more disproportionate role within the wider economy than the national average in the areas of manufacturing, electricity, gas and air conditioning, water supply and waste management, transportation and storage and retail and wholesale.
- 2.15 Employment land need is based on economic forecasts in the EDNA up to 2040.
- Based on past completions, the mid-scenario figure of **185ha** identified in the EDNA is considered achievable over the plan period; it is believed that a higher target would be unachievable, as the market would struggle to deliver it.
 - The supply of new land available and suitable for employment use is just **42ha** (including past completions for the period 2020 – 2022). This includes windfall supply, generated through intensification / recycling, resulting in a vacant land supply of **29ha**.

- Including the level of windfall / churn land available, we are **143ha short** of the need figure. It is considered that this shortfall can be met across the Black FEMA and through Duty to Co-operate with those Local Authority Areas identified as having a strong or moderate relationship with the Black Country FEMA.
- In addition to the above, the SLP supports a total of **1,206ha** of employment land through bringing forward existing allocations as well as allocating new sites.

2.16 Therefore, ensuring that an adequate supply of employment land is maintained throughout the plan period will be essential in enabling long term balanced growth to be sustained. The key issues to be addressed in the SLP are:

- Allocate land for new development within Sandwell, to facilitate growth and diversification of the economy
- Accommodate a variety of business needs including high technology manufacturing and logistics sectors.
- Protect and enhance land and premises within existing employment areas where this provides for the needs of jobs and businesses.
- Recognise that some sites will become unsuitable for continued employment uses and to facilitate their redevelopment to alternative uses.
- Enable local communities to share the benefits of economic growth.

- **Infrastructure needs**

Providing infrastructure to support growth - physical and social infrastructure is required to enable and support the growth required over the plan period.

Keeping Sandwell connected - a balanced approach to transport investment is required that recognises the need to invest in all modes of transport but identifies a priority in increasing the proportion of people using public transport, walking and cycling.

2.17 New housing and economic development will put pressure on existing services and utilities but may also create opportunities to provide infrastructure solutions. The SLP will need to provide clear guidance on the provision of suitable and sufficient infrastructure to support the regeneration and growth of Sandwell. Much of this infrastructure will need to be provided before or alongside new development and will need to be subject to viability considerations to ensure it does not make the development financially undeliverable.

- **Protecting and enhancing the environment**

Protecting and enhancing the natural and built environment - the SLP will need to deliver a strategy for the enhancement and protection of Sandwell's environment and make provision for new environmental infrastructure required to support sustainable growth.

2.18 Despite its industrial heritage and highly urban nature, Sandwell is home to several significant areas of green and open space, a network of wildlife corridors and sites with significant ecological and environmental value and several historic and architecturally significant buildings and locations.

2.19 The key issues to be addressed by the SLP include:

- Nature Conservation
- Nature Recovery Network and Biodiversity Net Gain
- Provision, retention and protection of trees, woodlands and hedgerows
- Historic Character and Local Distinctiveness of the Black Country
- Geodiversity and the Black Country UNESCO Global Geopark
- Canals
- The protection and enhancement of designated and undesignated heritage assets
- Rejecting poor design

Relevant evidence and studies

Economic Development Needs Assessment (EDNA) (December 2022)

2.20 The EDNA was a piece of work originally commissioned by the four Black Country Authorities as part of the evidence base for the Black Country Plan. The principal aim of this report was to provide updated evidence regarding the economic and employment land demand estimates in the Black Country. This assessment provides an update of the 2017 EDNA and the 2021 revision of the EDNA while also drawing on new economic forecasts produced post-pandemic.

2.21 The 2022 EDNA aimed to establish the objective assessment of employment land needs for the Black Country to 31 March 2041 (a twenty-year plan period). In October 2022 the Councils agreed not to proceed with the Black Country Plan and for the four local authorities to prepare their own individual Local Plans. Following the demise of the BCP, the report's authors, Warwick Economics & Development, were asked to update it for future individual use.

2.22 The evidence provided in this report focused on providing information for each BCLA, where available, with the main elements of the updated EDNA including:

- Review and presentation of the latest national, regional and local policy context.
- Review of the latest socio-economic characteristics of the Black Country.
- Review of the Black Country Functional Economic Market Area and the functional relationships between the Black Country Local Authorities (BCLAs) with neighbouring authorities.
- Forecast of future needs – drawing on a range of estimates and scenarios for future economic and employment growth in the Black Country (using projected trends, economic forecasts prepared by Oxford Economics, growth plans in the West Midlands and consideration of the potential impacts of the UK exit from the European Union and Covid19).

- Identification of future employment land needed to reflect the levels of forecast of both employment and Gross Value Added.

Black Country Employment Area Review (BEAR) (June 2021)

- 2.23 The BEAR Report formed part of the evidence base to support the preparation of the Black Country Plan. A key objective of the BCP was to ensure that there is sufficient employment land to meet the job needs of residents and accommodation requirements of businesses over the period of the plan to 2039. It was authored by the four Black Country Authorities, led by City of Wolverhampton Council.
- 2.24 The overall purpose of the Study was to assess the suitability of existing employment land across the Black Country for continued business and industrial use. The Study reviewed the stock of existing operational employment land already in use, identified what was suitable for retention and what could be released for other uses, notably housing. The Study was not concerned directly with the identification of currently vacant land for new employment development; this was considered in the Employment Development Needs Assessment (above) and associated Employment Land Supply statement.
- 2.25 For the purposes of the Study, employment land consisted of land for factories, warehouses, logistics and other uses that need to locate in industrial areas (trade wholesale, depots, car sales / repair garages, waste management). It did not include shops, offices, and leisure uses, as, while they employ people, they are directed into town and local centres.

Comments and responses from Issues and Options consultation

- 2.26 The first stage of consultation on the new SLP was undertaken between February and March 2023 and consisted of an Issues and Options exercise. This identified various topics and proposals relevant to Sandwell where we sought input from the public, stakeholders and developers. 42 responders provided 613 separate comments, which have been considered and where appropriate used to inform the subsequent policies.
- 2.27 A document setting out the comments and responses is available on the SLP web page, but in terms of the main issues, a selection has been summarised below:

Housing	Response
<ul style="list-style-type: none"> • Council will not be able to meet all its housing need • Council should explore all possible sources of housing land supply • Affordable housing requirements should be flexible 	<ul style="list-style-type: none"> • The Council is working with other councils to meet the shortfall by identifying opportunities in other areas • The draft SLP has a policy regarding viability. • A Call for Sites exercise was undertaken; the Council also undertook an assessment of brownfield and greenfield land to see if

<ul style="list-style-type: none"> • Need an appropriate balance between housing and employment land • A range of size and type of homes are needed. • Previously developed land needs to be assessed to see if suitable for housing • The Plan should promote development at locations that are or can be made sustainable. • Support measures to increase the supply of specialist older people’s housing. • Need to address the rise of low quality HMO’s 	<p>sites were suitable / available / deliverable for housing or employment land</p> <ul style="list-style-type: none"> • All sites have been through a site assessment process. Site assessments considered location, accessibility and impact on surrounding uses, and densities were tested based on a site’s accessibility and local character. • The SLP includes policies on specialist housing needs, including for older people and people with physical and other requirements. • New Policy on HMO included in SLP.
<p>Employment</p>	<p>Response</p>
<ul style="list-style-type: none"> • Needs arising within the Black Country FEMA should be addressed within the FEMA itself. • There is support for regeneration areas within Sandwell, which should be the focus for employment in the borough and redevelopment opportunities. • There is a need to plan all forms of business and industry, addressing the needs of both existing employers in the borough and seeking to attract inward investment 	<ul style="list-style-type: none"> • The Council is working with other councils to meet the shortfall by identifying opportunities in other areas • The SLP identifies a change from one core regeneration area in Sandwell to a number of separate regeneration areas and has included specific regeneration policies to support growth within them • The Council has looked at identifying employment development sites which could accommodate future employment growth.
<p>Climate change and environment</p>	<p>Response</p>
<ul style="list-style-type: none"> • Plan should recognise the role of the natural environment on reducing effects of climate change. • Factors exacerbating climate change should be avoided and the natural environment’s resilience to change should be protected. 	<ul style="list-style-type: none"> • The SLP contains several policies on climate change and the natural environment that seek to alleviate and mitigate the impacts of climate change • Draft SLP contains new policies on protection and retention of the natural

<ul style="list-style-type: none"> • Protect and retain trees / open spaces / wildlife corridors • BNG • Protection and enhancement of the historic environment, including locally listed buildings 	<p>environment and the enhancement of biodiversity.</p> <ul style="list-style-type: none"> • Given the marginal viability of much of the land and proposed sites in Sandwell, the Council is not asking for a minimum BNG target of more than 10 • There are several policies relating to the historic environment that will support the reuse and adaptation of heritage assets.
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3 Sandwell Local Plan Spatial Strategy - Background

- 3.1 The spatial strategy sets out the overall approach to the distribution of development across the borough. One of the ways in which the Local Plan can contribute to a more balanced future for Sandwell is by using the Spatial Strategy to provide a clear guide to the most sustainable locations for development. This approach will also take into account the aims and objectives of the Council's corporate plan, the outcomes of evidence gathering and locational information and the conclusions of the sustainability appraisal.
- 3.2 To ensure Sandwell Local Plan's Spatial Strategy addresses the right considerations, it will build on the previous approaches outlined in the Black Country Core Strategy and the draft Black Country Plan. It also reflects the issues and options identified during its preparation and consultation.

The Black Country Core Strategy (BCCS) – Spatial Strategy

- 3.3 The current Spatial Strategy for Sandwell is enshrined in the Black Country Core Strategy (2012) and forms part of a strategic approach agreed between the four Black Country Councils. This approach also included a shared Vision, sustainability principles and spatial objectives alongside the flexible and robust spatial strategy.
- 3.4 The BCCS Vision addressed the following directions of change, intended to steer the sub-region towards the sustainable delivery of growth and improvements and are summarised below: -
- Sustainable communities – the development of cohesive, healthy and properly-integrated communities, infrastructure, opportunities for recreation and a range of housing
 - Environmental transformation – delivery of high quality and liveable places and respecting and making the most of the Black Country's diverse natural and built environment
 - Economic prosperity – exploit the Black Country's accessibility to attract inward investment, deliver improved centres, support the local economy and offer wider opportunities for skills and educational growth.
- 3.5 The achievement of this vision required several sustainability challenges to be addressed: -
- Facing up to climate change
 - Sustainable development
 - Social inclusion
 - Brownfield first
 - Comprehensive approach to development
- 3.6 The objectives summarised below for the Core Strategy sought to deliver the Vision by 2026 and promoted: -
- a. Focussed investment and development in comparison shopping, office employment, leisure, tourism and culture within the four Strategic Centres: Brierley Hill, Walsall, West Bromwich and

Wolverhampton, to retain and increase their share of economic activity and meet the increasing aspirations of their catchment areas.

- b. A restructured sub-regional economy which provides sufficient strategic high-quality employment land in the best locations within Regeneration Corridors to attract new high technology and logistics businesses and also recognises the value of local employment land.
 - c. Model sustainable communities on redundant employment land in the Regeneration Corridors
 - d. Enhancements to the character of the Black Country's existing housing areas.
 - e. A network of vibrant and attractive town, district and local centres
 - f. A high-quality environment
 - g. A first-class transport network providing rapid, convenient and sustainable links between the Strategic Centres, existing and new communities, and employment sites.
 - h. A sustainable network of community services, particularly high quality lifelong learning, health care and sport and recreation facilities.
 - i. Sufficient waste recycling and waste management facilities in locations which are the most accessible and have the least environmental impact.
 - j. Safeguard and make the most sustainable use of the Black Country's mineral resources including primary, secondary and recycled materials, without compromising environmental quality.
- 3.7 The Spatial Strategy itself drew from these various aspects and took the form of a series of strategic policies and key diagrams that identified and supported a Growth Network across the sub-region. This Growth Network was the focus for delivery of the spatial objectives and contained the majority of locations where growth, regeneration and land-use change were expected to occur.
- 3.8 In addition, the Spatial Strategy identified four Strategic Centres (Brierley Hill, Walsall, West Bromwich and Wolverhampton) and 16 Regeneration Corridors, which were well-served by the transportation system and thus provided the most sustainable locations for housing and economic activity.

Sandwell Site Allocations and Delivery Development Plan Document (SAD)

- 3.9 The SAD was adopted in 2012 and did not contain its own spatial strategy – instead it concentrated on shaping local policies and proposals to help deliver the Core Strategy objectives, based around the five regeneration corridors in Sandwell and West Bromwich Strategic Centre.
- 3.10 It focussed employment land and growth in two of the five corridors (Hill Top and Oldbury / West Bromwich), housing in two others (Dudley Port / Brades Village and Rowley Regis / Jewellery Line) and a mix of both housing and employment in the fifth one (Tipton / Princes End / Coseley).

The Black Country Plan (BCP) Development Strategy

- 3.11 Prior to the emergence of the draft Black Country Plan, work was undertaken at a sub-regional level to establish the levels of housing and employment land need across Birmingham and the wider

housing market area. Overall, the evidence pointed to a growing economy with its needs balanced against a significant current and emerging housing shortfall.

- 3.12 The housing shortfall was highlighted in an independent report (Greater Birmingham and Black Country Strategic Housing Needs Study 2015) covering the Greater Birmingham and Black Country Housing Market Area, which considered the housing need for the wider HMA and examined scenarios for distributing the identified housing shortfall. The study concluded that the supply of brownfield land across the HMA was insufficient to accommodate this shortfall. The study identified several locations in and around the Black Country as potential locations to accommodate strategic developments. Possible locations for sustainable urban extensions included the vicinity of Dudley and Brownhills. These areas were assessed as part of the site assessment process carried out to support the draft BCP.
- 3.13 Separate evidence (the 2017 Black Country Economic Development Needs Assessment and its update in 2021) pointed to the need for additional employment land. This increased and sustained demand arose because of a growing requirement for industrial and warehousing land, which was not anticipated or planned for in the previous BCCS. In the previous Strategy, it was anticipated that industry would continue to decline as employment shifted to the office and service sector, which generally requires less land. Much of the employment land was expected to become surplus to requirements and thus available for reallocation to meet housing needs. This shift did not occur and many of the employment sites allocated for housing have continued in profitable employment-related use.
- 3.14 This is very apparent in Sandwell in particular, where many of the sites allocated for housing in the SAD have remained in active economic use and their landowners have confirmed a commitment to both continue and, in some cases, expand operations on those sites.
- 3.15 As part of the iterative plan making process for the BCP, and for the Sustainability Appraisal (SA) to inform the development strategy, five housing growth and five employment growth options were developed, which were then subject to sustainability appraisal. The appraisal process compared the potential impacts of the options and provided an opportunity to examine different approaches to meeting the housing and employment requirements across the BCP plan period.
- 3.16 The five housing growth options were: -
- 1 Do nothing and continue with a brownfield-first approach and focus development within the urban area – 40,000 houses in urban area
 - 2 Continue with a brownfield-first approach plus sustainable and deliverable green belt releases during and post-plan period – 47,837 houses across the Black Country
 - 3 Locate all new development across the Black Country within the plan period – 76,000 houses
 - 4 Locate all new development across the Black Country within the plan period plus 3,000 houses included to help meet Birmingham's need – 79,000 houses

- 5 Locate housing across the Black Country and export some need to neighbouring authorities under the Duty to Co-operate – 40,000 in the urban area, 9,000+ (both during and post-plan period) in the Green Belt and 28,200+ houses exported to other authorities

3.17 The five employment growth options were: -

- 1 Retain existing brownfield strategy by focussing development in the urban areas – 306ha
- 2 Retain existing brownfield strategy plus green belt release – 306ha + 47ha
- 3 Retain existing brownfield strategy plus substantial green belt release – 306ha + 118– 207ha
- 4 Retain existing brownfield strategy plus green belt release and exporting need to neighbouring authorities – 306ha + 47ha + 71– 160ha
- 5 Retain existing brownfield strategy plus green belt release plus substantial export to neighbouring authorities - 306ha + 47ha + 140– 444ha

3.18 Consideration of these ten growth options led to a need to consider a set of spatial options to deliver the necessary levels of growth. The spatial options were assessed in the SA and are summarised below:

Spatial Strategy Options

Option	Detail
Option A Business as Usual	Retain current housing and employment allocations
Option A1 Employment-led growth	Business as Usual plus employment-led green belt releases
Option B Reconfigure uses in the Urban Area to Promote Mixed Use and Local Employment	Retain more local employment land, intensify existing employment areas and explore potential to changes uses in Strategic and Town Centres
Option C Maximise Densities and Invest in Services to reduce climate change impacts	Increase densities to 50 dph / 200 dph in centres and invest to fill gaps in residential services (schools, GPs, fresh food, employment)
Option D Market-Led	Allocate housing in high demand areas and employment land in most attractive commercial locations

Option	Detail
Option E Open Space Protection / Health Promotion	Protect publicly accessible open space within the urban area and create new open space to serve developments, as this is more functional for local communities than Green Belt
Option F1 Green Belt and Landscape Character Protection	Protect all areas of highest Green Belt harm and landscape sensitivity, regardless of potential positive sustainability impact of development in these locations
Option F2 Green Belt Protection	Protect all areas of highest Green Belt harm
Option G Garden Village / urban greening to adapt to climate change	Lower density, mixed use development on larger sites (Key Large Sites?) with more open space which supports the Nature Recovery Strategy (funded by Biodiversity Net Gain) and flood risk mitigation and more on-site residential services
Option H Maximise Sustainable Access to reduce climate change impacts	Only build housing in locations with highest levels of sustainable transport access to residential services (schools, GPs, fresh food, employment) and only locate new employment land where good public transport access
Option J Balanced Growth	Focussing growth within the existing residential and employment areas in the sub-region taking advantage of their existing infrastructure capacity, alongside a limited number of new growth areas near to the edge of settlements that take account of environmental, climate change, accessibility and socio-economic requirements

3.19 A decision was taken to endorse the fifth option for the housing and employment land growth scenarios and Option J (balanced growth) as the preferred spatial delivery option.

West Midlands Combined Authority Study – Brownfield Land

3.20 As part of the evidence for the BCP, and in response to queries around the capacity of the Black Country to deliver additional housing on brownfield sites, a study was commissioned by the West Midlands Combined Authority that considered the approach to land allocation undertaken by the four authorities, and whether additional brownfield land could be made available given different approaches.

- 3.21 The study looked at the four Black Country authorities' current and future needs and land supply and examined in detail its capacity related to the amount of previously-developed land that was available. The conclusions of the study are set out below:
- i. The approach used to select brownfield sites for development in the BCP was appropriate. The assessment of other brownfield sites that had not been identified in the Plan was also appropriate. The density assumptions used in the Black Country Plan were reasonable. The approach used to identify 'windfall' development – sites that were not specifically identified in the Plan, but that could come forward over the Plan period was appropriate.
 - ii. Some further explanation was required on how the non-implementation rates of some employment land to be developed for housing are calculated. The study suggested a reduction in the non-implementation rate used by the Black Country Authorities would lead to additional capacity. However, the potential capacity to be derived from this in the context of the overall shortfall was unlikely to be significant.
 - iii. Some lower-quality employment sites could be redeveloped for housing using a more interventionist strategy. However, given the challenges of land assembly, viability and the need to support the existing and potential business base of the area, the study acknowledged that the experience gained from the delivery of the current Core Strategy showed that the housing capacity generated from such sites was likely to be limited.
 - iv. The study also acknowledged the key barriers to unlocking challenging sites in terms of landowner / occupier intentions and the lack of viability for re-development that is prevalent across much of the Black Country.
 - v. The strategic centres were identified as key drivers for growth and locations which offer opportunities for change and repurposing. Opportunities associated with the repurposing of existing vacant and under-utilised commercial floorspace, especially retail, alongside the potential offered by alternative uses of lower quality employment sites and a proactive approach towards mixed-use development could help to drive new residential provision.
 - vi. Furthermore, opportunities for new housing development within the 17 Black Country Tier Two centres should be explored in further detail as part of a refresh of the Black Country Urban Capacity Study.
 - vii. It was anticipated that some additional capacity would be identified through future local plan-related work. However, this would not be sufficient to meet the identified shortfall of some 28,000 homes and 210ha of employment land within the Black Country.
- 3.22 This work effectively demonstrated that there was little, if any, additional capacity within the Black Country able to provide additional housing at the scale required to meet the shortfall. This situation has not changed during the preparation of the SLP, as evidenced by the results for new and updated evidence on housing and employment demands and supplies and site assessments.

4 Sandwell Local Plan – spatial options and alternatives

4.1 National planning guidance states that:

Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable²³.

4.2 The assessment of options (or alternatives) is also an important requirement of the SEA Regulations, which requires the Environmental Report to include:

... an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

4.3 Reasonable alternatives will be assessed through the SA process to enable options for the SLP to be explored. In this way, the SA can provide a coherent story of the SLP's evolution and choice of options by assessing reasonable alternatives in reports prepared throughout the plan making process.

4.4 Given Sandwell's highly urbanised nature and its location at the heart of the main West Midlands conurbation, it is neither feasible nor realistic to identify reasonable alternatives that require the use of large tracts of vacant open land, either brownfield sites or land that is classified as greenfield / undeveloped. Sites like this are either not available in Sandwell or they are subject to other designations or constraints, such as green belt, nature conservation or open space uses.

4.5 In view of the levels of both housing and employment land needs, it is becoming apparent that Sandwell will not be able to meet them either within the borough or across the plan period in full. To try to do so would result in significant and harmful levels of overdevelopment in the urban areas and the loss of open and green spaces across the district; even then, development needs would not be fully met. This degree of overdevelopment would inevitably have an adverse effect on the living environment, health and wellbeing of Sandwell's residents, alongside the exacerbation of climate change impacts and the degradation of the natural and built environment, habitats and green and blue infrastructure.

4.6 We are surrounded by equally built-up urban authorities, who themselves do not have significant spare capacity to accommodate housing or employment overspill (except in the areas of West Midlands Green Belt falling within their boundaries), and a wider housing market area that is also subject to a significant housing shortfall.

4.7 Sandwell has very little green belt (it falls mainly within Sandwell Valley) and very few vacant / unused open spaces; the areas of undeveloped and open land it does contain are extremely important to the borough's environment and the health and wellbeing of its population.

²³ PPG Paragraph: 018 Reference ID: 11-018-20140306

- 4.8 In addition, Sandwell's history of intense industrial activity and ancillary undertakings means that much of the land that may become available for development is generally polluted and in need of considerable remediation before it can be used. This in turn affects site viability, which acts as a constraint on the type and amount of development that can be delivered.
- 4.9 This same industrial history has left a further legacy in the form of the borough's architectural heritage. Sandwell has a responsibility to protect its built heritage, which includes nine conservation areas, over 200 statutorily listed buildings and a further 176 locally listed buildings. The borough's rich industrial heritage is of note, which we are keen to safeguard as a record of our history.
- 4.10 Several potential strategy options for Sandwell have been identified however and will be assessed for their suitability. In addition, the spatial alternatives identified for the Black Country Plan are also still broadly relevant to Sandwell, and these will be considered where reasonable.
- 4.11 This appraisal therefore explores alternative approaches to the location and amount of growth being proposed in the SLP. In this way, the most appropriate strategy can be ascertained, one which delivers sustainable and sufficient housing, employment and regeneration opportunities.
- 4.12 Most local planning authorities employ a similar approach to identifying a spatial strategy, by using a set of parameters to gauge the effectiveness of alternative approaches to delivering housing and employment. They will identify credible and potentially deliverable options and will compare these options to arrive at the most suitable solution. These parameters will vary according to the nature and location of the local area, but all will usually share certain key aspects.
- 4.13 Below we set out the broad parameters that we have identified, against which reasonable alternatives can be measured:
- The first stage of the consideration of reasonable alternatives identifies the growth options, in terms of the **quanta of development** that is required to meet the needs identified in evidence (how many new homes / how much employment land must the Local Plan provide for) and the broad **spatial delivery options** that can be used to distribute that development across Sandwell (which broad areas within the borough are more suited or less suited to growth).
 - The next stage sets out more refined **spatial growth options**, which consider how the overall level of homes and area of employment land (and other types of land use where applicable) could be strategically distributed, thus helping to meet some of the strategic aims of the SLP.
 - A further stage will look at identifying **development sites** of different sizes and types and will also consider whether there are any alternative **policy options**, where there may be one or more potential approaches to a subject. It is not always possible or necessary to derive reasonable alternatives to policies.

Quanta of Development

4.14 The following table identifies several options for housing growth that have been tested for deliverability and sustainability across the plan period. The numbers are based on different sources and provide an illustration of how Sandwell's new local plan could address the borough's housing need in a realistic manner.

A) Housing

	Option	Outcome (no. of dwellings)	Per annum (19 years)	Comments
A	Meet a proportion of housing need across plan period (2022 - 2041) based on average annual levels of delivery for last 10 years (do nothing)	12,523	659	Based on past completions when there was a buoyant market and easier sites to develop. Sites that are now left are fewer in number and have difficult ground conditions, so it is unrealistic to expect that this rate can be achieved over the plan period.
Meet entire housing need identified through Standard Method across plan period (2022 -2041):				
B	Based on 2014 household projections (using 2022 affordability ratio)	29,773	1,567	Unachievable and doesn't achieve balanced growth
C	Based on 2021 census figures (based on increase in households of 7.2% ²⁴)	23,522	1,238	Unachievable and doesn't achieve balanced growth

²⁴ 2021 Census showed number of households in Sandwell had increased by 7.2% since 2011

Option		Outcome (no. of dwellings)	Per annum (19 years)	Comments
D	Meet proportion of local housing need based on supply of identified sites and small windfalls identified in current SHLAA (2022) and seek contributions from adjacent authorities based on current offers and apportioned using travel to work data (DtC)	9,044	476	Achievable and accords with a balanced growth option
E	Meet proportion of local housing need based on supply and small windfalls identified in current SHLAA (2022) plus aspirational growth in the Regeneration Areas and Centres and an indicative contribution from adjacent authorities based on current offers and apportioned using travel to work data (DtC) of 295 dwellings.	11,462²⁵	603	Achievable and accords with a balanced growth option. This also provides some aspirational growth in the regen areas
F	Meet housing need (Standard Method 2014 and 2022 affordability ratio) and contribute 2,000 houses to wider HMA needs	30,206	1,590	Unachievable

- 4.15 The accompanying narrative in the SA explains how overall impacts were identified for each of these options. In brief, the conclusions were that the options proposing larger numbers of houses would be more likely to lead to adverse effects when analysed against environmental objectives, but that they would perform better against economic objectives. The converse is also expected, that options proposing fewer houses would perform better against environmental objectives compared to the economic ones. As such, it can be difficult to identify a definitive best-performing option.
- 4.16 Across the objectives, it appears that **Option D** would have the smallest impact on the SA Objectives so could be described as best performing in sustainability terms, but this option falls short of meeting the housing need and so would also be likely to have the lowest scope for delivering varied and high-quality homes to meet the needs of the population.
- 4.17 The options providing higher levels of housing are unlikely to be deliverable in Sandwell, given the various constraints and adverse ground conditions that affect much of the land within the borough. Given the importance of balancing housing growth with environmental and climate change aspirations, while at the same time achieving the delivery of housing that will help meet the needs of

²⁵ Discussions are ongoing – the SLP figure reflects the identified supply excluding the DtC figure as this is not agreed.

Sandwell's residents, an option allowing for the delivery of a realistic and sustainable quantum of housing, that includes elements of aspirational housing and will also help deliver the plan's wider aims and ambitions around regeneration, growth and supporting the economy.

- 4.18 On this basis, we feel that **Option E** will provide the most sustainable and deliverable minimum target for new housing across the plan period.

B) Employment

- 4.19 The baseline figure for total employment land in Sandwell (currently occupied) is 1,188ha, according to the latest BEAR information. Figures from the BEAR and the EDNA have changed as the work is updated.

Option	outcome
A	Rely on existing vacant employment land supply (do nothing)
B	Provide for the highest estimate of need (EDNA)
C	Provide for the lowest estimate of need (EDNA)
D	Provide for mid-range estimate of need (EDNA update, August 2023)

- 4.20 The accompanying assessment narrative in the sustainability appraisal explains how overall impacts were identified for each of these options.
- 4.21 There is uncertainty regarding the exact impacts the employment growth options would have, owing to the unknown scale and nature of the developments. The options will also act differently against each of the sustainability appraisal objectives, which means that identifying a definitive best-performing option is difficult.
- 4.22 Option B performs best against economic objectives but performs less well against environmental objectives as it requires the most land; conversely, Option A performs best against environmental objectives owing to its focus on existing vacant employment land but less well against economic objectives and it does not fulfil Sandwell's identified employment need. Option C would be deliverable. Option D is also considered to be appropriate and deliverable; it will provide for additional growth but without the potential environmental impacts of Option B.
- 4.23 As such, **Option D** appears to perform best against all the objectives collectively as it provides enough land to deliver more than the lowest estimate of need, performs well against the economic objectives and although having negative impacts against environmental objectives, is likely to have less of an impact than Option B. Some of the environmental impacts could also be mitigated through the design of developments.
- 4.24 There have been Duty to Co-operate offers of an additional 133.6ha from Shropshire and South Staffordshire to the Black Country Functional Economic Market Area. This has not yet been apportioned between the four Black Country Local Authorities. Discussions around Duty to Co-

operate will need to take place with Dudley, Walsall and Wolverhampton and Statements of Common Ground agreed.

- 4.25 Given the considerations outlined above and the need to ensure that a realistic and deliverable supply of employment land was maintained throughout the plan period, Option C was considered to be the most sustainable option to work from. It allowed for the provision of additional employment opportunities but was also pragmatic about what could be achieved given the constraints on land supply in the borough.

C) Gypsy and Travellers and Travelling Showpeople provision

- 4.26 In accordance with the national planning policy for traveller sites, Gypsies and Travellers (G&T) are defined as:

“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such”.

- 4.27 Travelling Showpeople (TS) are defined as:

“Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above”.

- 4.28 Three options for Gypsy and Traveller and Travelling Showpeople growth have been identified by the Council.

Option		Outcome – GT (pitches)	Outcome – TS (plots)
A	Meet a proportion of housing need across part of the plan period (2025-2030) and schedule an early review of the SLP to readdress need across later stages	8	24
B	Meet proportion of local housing need based on supply and small windfalls identified in current SHLAA (2021) and seek contributions from adjacent authorities based on current offers and apportioned using travel to work data (DtC)	10 (SHLAA)	0
C	Meet entire need	14	32

- 4.29 The accompanying assessment narrative in the SA explains how overall impacts were identified for each of these options.
- 4.30 It appears Option B performs better across most sustainability appraisal objectives; this is due to Option B having the fewest number of proposed pitches / plots and so potentially having the smallest impact on some of the environmentally-focused sustainability appraisal objectives. However, a minor negative effect has been identified for Option B against the housing objective, as it would only partially meet the Gypsy and Traveller need and would provide no Travelling Showperson plots.
- 4.31 Consequently, Option A could be identified as performing best overall in sustainability terms, as it provides a proportion of both the Gypsy and Traveller and Travelling Showperson needs. It should be acknowledged though that since Option A proposes to “*schedule an early review of the SLP to readdress need across later stages*”, there is some uncertainty regarding the longer-term effects.
- 4.32 **Option B** remains the most realistic option however – it delivers the required five-year supply and in the absence of any local demand for additional Travelling Showpeople plots, will have least impact.

5 The Approach to Delivery

- 5.1 Sandwell Council is aiming to utilise land efficiently, using previously developed land, vacant properties and surplus industrial / employment land, and to maximise housing densities where appropriate. There is an identified shortage of deliverable sites to meet our housing and economic growth needs. There is however no justification for the redrawing of green belt boundaries within Sandwell, given the limited supply of such land and the important role it plays in preventing coalescence with adjoining towns and settlements within and beyond Sandwell's boundaries and the importance of maintaining open land within the borough.
- 5.2 There is similarly no intention to allocate greenfield land or open spaces to accommodate additional development as a rule, despite the recognised shortfalls. Given the importance of green infrastructure to the health and wellbeing of Sandwell's residents and its role in combatting climate change, as well as the significant part it plays in maintaining ecologically sensitive habitats and corridors, we do not intend to allocate such land for housing or employment uses in general.
- 5.3 Notwithstanding this, where strategic development opportunities consisting of larger sites capable of accommodating accessible and sustainable housing / employment / community mixed uses have been identified, they were assessed. Where the Council felt they would make a substantial contribution to meeting Sandwell's needs, they have been allocated. This involves a small number of sites that are currently undeveloped or partially developed.
- 5.4 We explored various approaches to the delivery of land for development as part of the wider considerations around how and where we might be able to maximise housing and employment land provision. We also took account of the BCP Spatial Strategy Options to help shape our approach (see paragraph 3.18 above).
- 5.5 Through discussion, the use of evidence and local knowledge of the various sites and locations involved, the following potential delivery choices were identified:
- Maintaining all current allocations set out in the draft Black Country Plan and the Sandwell Site Allocations and Delivery Development Plan Document and identifying new development opportunities for housing and employment uses entirely within urban area on previously developed land – to include regeneration areas and contributions from other neighbouring authorities under the duty to co-operate. This would allow for the delivery of a realistic and balanced amount of growth across the borough.
 - As above, plus releasing land for housing / employment from areas of vacant, underperforming and / or derelict open space sites and green belt. This was not considered to be suitable as no green belt land would be released for development in Sandwell, given the issue of its importance as set out in paragraph 5.1.
 - Redeveloping areas of existing older housing to provide higher density and energy-efficient new housing and redeveloping existing employment areas to provide greater employment capacity. This was considered but the Council has no current plans to undertake estate renewals, so it is

unlikely to be a major source of housing going forward. Should this situation change, any opportunities that arise can be captured in subsequent reviews of the SLP or using masterplans and supplementary plans.

- Redeveloping / reconfiguring urban areas to promote mixed use and local employment. This accorded with an employment-led approach if applied to existing centres and would help to promote them as a sustainable location for new growth. It would lead to changes in the character of many centres, though, which would have to be sensitively managed to avoid adverse impacts, especially in more historic locations.
- Using a proportion of currently identified housing allocations and areas of older housing (to be redeveloped) for additional employment land. While this would alleviate the lack of employment opportunities, it would exacerbate housing shortfalls and would not provide a sustainable or balanced approach to delivery.
- Using a proportion of current local employment land for housing. As above, this would increase the shortfall of employment land and would not provide the necessary sense of balance between types of growth.
- Retaining local employment land, intensifying the use of existing employment areas and exploring the potential to change land uses within West Bromwich and other centres to provide additional employment sites. This again would support an employment-led growth strategy and would help to focus growth on regeneration areas in need of investment but would have implications for the creation of sustainable communities and the delivery of other forms of development.
- Meeting housing and employment need in urban area and exporting growth to surrounding local authorities under the duty to co-operate. Given the recognised shortfalls in surrounding local authorities who are unable to meet their own development needs, this would be an unrealistic and undeliverable approach.
- Re-examining housing densities on urban sites around transport hubs / nodes and in larger town centres, including the use of tall buildings - increasing densities to 45 dwellings per hectare outside centres and 100 dwellings per hectare in West Bromwich and addressing any related capacity gaps in residential services e.g. schools, healthcare, leisure / recreation and infrastructure. This is a more balanced and deliverable approach and accords with the principles of sustainable development, national legislation and the creation of healthy communities.

5.6 Out of this consideration came broad agreement about what type of growth might be most suitable for Sandwell and where it might best be located. This formed the basis for the development of four distinct spatial growth options, which are considered in more detail in Section 6.

6 Spatial Growth Options

- 6.1 Following the consideration of various broad approaches to site location and potential delivery (section 5 above) four broad Spatial Growth Options have been identified by the Council and are set out below. These options consider how the overall number of homes and area of employment land (and other types of land use where applicable) could be strategically distributed within the borough, thus helping to meet the aims of the emerging Plan.

Option
<p>A - Balanced Growth: –</p> <ul style="list-style-type: none"> – focus most new growth within the existing residential and employment areas of Sandwell; – continue to deliver most new development on previously developed land and sites; – take advantage of existing and improved infrastructure capacity to maximise development on new sites; – make improvements to / allowances for the environmental, climate change, accessibility and socio-economic capacity of existing residential and employment areas; – examine the potential for providing housing / employment development on areas of vacant and underused open spaces and undeveloped land within the urban areas; – consider any possibility for increasing housing densities in town centres and West Bromwich; – protect areas of designated habitat and ecological value; – protect the historic and archaeological environment and areas with geological and landscape value.
<p>B - Green Growth: –</p> <ul style="list-style-type: none"> – restrict new development to brownfield and previously developed sites; – promote the use of zero- and low-carbon designs, building techniques, materials and technologies in all new development; – only allocate housing in locations with the highest levels of sustainable transport access to residential services (retail provision, schools, healthcare facilities, fresh food, employment etc.); – only allocate new employment land where sustainable access and good public transport links are available; – redevelop existing housing and employment areas to deliver cleaner, more energy-efficient and more intensive areas of growth; – maximise climate change adaptation and mitigation through the creation, protection and improvement of parks, woodland and tree planting, open spaces, landscapes and habitats across the borough; – protect open spaces and areas of habitat and ecological value within and beyond the urban areas;

Option
<ul style="list-style-type: none"> – create additional public open spaces to serve new housing developments; – protect the historic and archaeological environment and areas with geological and landscape value.
<p>C - Economic Growth: –</p> <ul style="list-style-type: none"> – retain, protect and enhance all types of local employment land; – intensify the use of existing employment areas through redevelopment and redesign of existing areas and infrastructure improvements; – explore the redevelopment of retail and other commercial areas in town centres to provide additional employment sites; – allocate employment sites on derelict / vacant open space within the urban area; – identify and allocate areas with the potential to deliver larger employment sites via site assembly; – locate new housing and services, facilities and infrastructure to serve existing and proposed employment areas; – protect areas of designated habitat and ecological value; – protect the historic environment, including areas with industrial design and archaeological interest, and areas with geological and landscape value.
<p>D - Housing Growth: -</p> <ul style="list-style-type: none"> – focus new growth within the existing residential and employment areas of Sandwell; – continue to deliver most new development on previously developed land and sites; – examine the potential for providing housing development on areas of vacant and underused open spaces and undeveloped land within the urban areas; – redevelop areas of existing older housing to provide higher density and energy-efficient new housing; – reallocate areas identified for employment land provision for additional housing development; – allocate new housing on urban sites around transport hubs / nodes and in towns and local centres, including the use of tall buildings in appropriate locations; – increase overall housing densities to 100dph in West Bromwich and 45dph outside it and meet capacity gaps in associated residential services e.g. schools, healthcare, leisure / recreation, infrastructure; – protect areas of designated habitat and ecological value; – protect the historic and archaeological environment and areas with geological and landscape value.

7 Sandwell's preferred approach

- 7.1 The development strategy will need to meet the NPPF necessity for sustainable development to sit at the heart of local plans, reflecting national priorities for strategic planning. This will include addressing the need to tackle climate change and the consideration of social, environmental and economic sustainability objectives. The strategy will seek to deliver a supply of homes whilst supporting the vitality of our town centres, promoting healthy and safe communities across the Borough and making efficient use of land, in line with NPPF guidance. Our strategy must also support Sandwell's economy and communities and help to protect our special and diverse environment.
- 7.2 Sandwell Council identified and tested a series of options relating to the potential quanta and distribution of housing and employment growth. These have been subject to an impartial assessment of their sustainability. The Sustainability Appraisal demonstrated that the social, environmental and economic implications of the options identified, for the spatial strategy, are interrelated and varied.
- 7.3 Given the outcomes of this assessment, the Council has considered what the most appropriate direction of growth might be for Sandwell, in relation to both opportunities and constraints as well as the likelihood that the borough would not be able to meet its housing and employment requirements in full even if significant areas of open land were further identified and allocated for development.
- 7.4 We need to strike a balance between maximising the delivery of development land available to it and working towards delivering the aims set out in the SLP Vision. The Vision pictures a borough that could deliver both economic and housing growth while improving the health and life chances of its residents, overcoming the challenges of climate change and protecting and enhancing its natural and built environment.
- 7.5 To achieve this will require careful consideration, not just of the quanta of development but also the need to identify where that development should go:
- to benefit the health and wellbeing of local people by providing them with positive choices about housing, lifestyles, employment opportunities, levels of activity and proximity to green spaces;
 - to protect Sandwell's natural environment, open spaces, geology and historic environment;
 - to maximise opportunities for regeneration and renewal in employment areas;
 - to promote economic growth that sustains and supports fragile town centre economies;
 - to increase the accessibility and use of public transport.
- 7.6 As mentioned above, there is little scope or desire to identify or allocate greenfield land for new housing or employment development without adversely affecting vulnerable land uses. To do so would also run counter to the Council's stated aims in relation to creating a healthy and active borough, maintaining and enhancing the natural and built environment and tackling the impacts of climate change.

Green Belt

- 7.7 Areas in England designated as Green Belt are not allocated as a reflection of any landscape or environmental merit. Rather, the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. In Sandwell, these functions are critical in ensuring that additional development will not adversely impact on open areas such as Sandwell Valley, and as such Sandwell Council is not proposing to allocate any sites in the green belt, despite the identified housing shortfall.
- 7.8 The Government gave a broad indication recently (2023) that it does not expect local authorities to designate green belt sites to meet housing need, even if there is a shortfall. Green belt (and other open space sites) in Sandwell are also subject to constraints such as nature conservation designations, historic or archaeological interest, high landscape value, flooding and similar issues.

Greenfield and brownfield land

- 7.9 There is a strong preference on the part of the Council to ensure that new development (for both housing and employment development) takes place on brownfield or previously developed land. Much of Sandwell is already developed and as a result there is a regular “churn” of sites coming forward for development that have already been built on in the past. The draft SLP encourages this approach through the new and updated policies it is proposing.
- 7.10 However, given the identified and significant shortfall in both housing and employment land supply to help meet future needs, it will be necessary to consider the allocation and development of a limited number of greenfield sites. Although this is not the preferred solution, such new development will take place in sustainable locations where it can make use of existing infrastructure, support existing services and facilities and deliver improvements to them where necessary. In addition, the Council will ensure that housing schemes in particular offer significant capacity for improved and additional green spaces, landscaping, environmental provision and climate change mitigation.
- 7.11 A number of sites were identified for housing and employment uses both during the work on the Black Country Plan and through more recent housing assessment exercises, some which have also been previous allocations in the SAD. These sites will for the most part be proposed for allocation and delivery through the SLP as they remain suitable and sustainable opportunities for the growth that Sandwell needs.
- 7.12 There have also been more recent proposals for development on sites within Sandwell that will be included in the SLP as allocations, to allow us to identify and manage their contribution to meeting current and future housing needs. These include sites at Brandhall Golf Course, Rattlechain and Friar Park.
- 7.13 The Council-owned site at Lion Farm, which has been under consideration as a retail outlet for many years, is now (given the fall-off in demand for retail floorspace) being assessed as a potential location for additional housing and employment land. It contains 11 playing pitches in active use, a majority of which will be retained onsite and improved as part of any future development. Pitches lost to development will be replaced elsewhere in the southern part of Sandwell, so that there will be no overall loss in the number of opportunities for recreation and sports provision.

- 7.14 The greenfield nature of these sites makes them an exception in terms of the wider development strategy of the SLP; the outcome of the sustainability appraisal of the proposed growth options suggests that the presumption should be in favour of identifying opportunities for development on brownfield and previously developed sites. Small or medium-sized sites that are greenfield, green belt, ecologically valuable or in recreation, leisure or community use are very unlikely to be considered suitable for future development, although ongoing site assessments will need to take them into account as we are required to consider all reasonable alternatives²⁶. In addition, we anticipate that during the lifetime of the adopted plan, greenfield and open / undeveloped sites may come forward for consideration as housing windfalls; these will be assessed against local plan policies and where they do not meet the criteria set out in those policies, they will be refused.
- 7.15 Any other greenfield site that could make a significant positive contribution to meeting Sandwell's identified high levels of housing or employment needs will need to be assessed as part of the draft plan's ongoing consideration of reasonable alternatives. However, allocation would be considered only if that site was of a strategic size and in a sustainable location, and the loss of any open or green space could be fully mitigated, by being replaced by better quality green / blue infrastructure, open spaces and / or facilities.
- 7.16 Proposed land uses will also be considered, with schemes for housing and employment taking precedence over other forms of use or activities that may be more suited to town centres or in other previously developed areas.
- 7.17 Apart from this specific set of circumstances, Sandwell Council will not be looking to allocate further previously undeveloped land in the Sandwell Local Plan. We will instead be concentrating on the improvement, redevelopment and regeneration of existing sites, land and buildings to provide for additional growth.

Employment land

- 7.18 Of a Black Country supply of 2,914ha of employment land and sites, Sandwell currently provides 1,206ha, over a third of the total and more than any other Black Country authority. Levels of demand for employment land remain high with the most recent estimate for the period 2018 – 2039 being 185ha, based on past trends.
- 7.19 The Black Country Core Strategy originally identified a number of these sites as suitable for reallocation to help meet housing needs. This was decided on the basis that the Black Country's employment base was understood to be reducing in size as the nature of economic activity in the area changed. However, the anticipated fall-off in the level of manufacturing and industrial activity did not occur, and it became apparent during the drafting of the Black Country Plan that there was not only

²⁶ Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made – from National Planning Policy Guidance

the need to maintain a healthy supply of employment land but also an increasing demand for additional suitable and sizeable sites for such uses.

- 7.20 As a result, the potential supply of brownfield sites suitable for conversion from employment to housing use has effectively been reduced, to maintain economic stability and allow for further economic growth. However, some current employment sites are still being allocated for housing, where owners have decided they wish to undertake alternative development. This means that the supply of available employment land has been reduced further and the pressure to meet the ongoing shortfall has thus increased.
- 7.21 Work is still being undertaken at a Black Country level on employment land need and supply and as such, the quantum of land available / required in Sandwell has not been finalised at the present.

Housing provision

- 7.22 Housing need also remains high in Sandwell and the shortfall between need and supply is, as identified above, considerable. The Council will explore with other surrounding authorities the opportunities for exporting a proportion of its housing growth requirements (through the Duty to Co-operate). It is however very unlikely that sufficient capacity exists elsewhere in the HMA to make a meaningful contribution to meeting our need, as surrounding authorities also maintain significant shortfalls in their own districts.
- 7.23 The process of plan-making across the HMA has been affected by the decision of several local authorities (including South Staffordshire, Bromsgrove, Lichfield and Solihull) to pause work on their local plans until new national planning guidance is issued. This means that we are unable to accurately gauge the capacity of other authorities to help meet Sandwell's need.
- 7.24 While housing figures and calculations of need are currently in flux and are subject to ongoing work, some of the headline figures from extant plan reviews and updates offer an idea of the dearth of opportunities to meet Sandwell's needs. Birmingham City Council is currently (2023) preparing a new local plan and at the Issues and Options stage identified a housing need of 149,286 dwellings between 2020 and 2042 and a likely supply of 70,871, leaving a shortfall of 78,415.
- 7.25 In all, this means that we need to look to our own resources to identify a realistic and deliverable quantum of development land for Sandwell that respects the environmental and social needs of the borough. It will also mean that we will not be able to meet all our housing and employment land needs without adversely impacting upon both local communities and the wider environment.
- 7.26 The NPPF requires local plans to meet their Local Housing Need unless there is a strong reason for restricting the overall scale, type or distribution of development in the plan area; or the adverse impacts of meeting the need would significantly and demonstrably outweigh the benefits when assessed against the NPPF²⁷. There are several reasons why Sandwell is unable to meet its housing need in full and these relate in the main to the urban nature of Sandwell: -

²⁷ NPPF (2021) paragraph 11b

- a. there are very few opportunities for larger-scale development that could deliver coherent new communities as land supply of all types is constrained by the dense urban character of the borough;
- b. much of the land within Sandwell is affected by contamination and / or stability issues, a legacy of its former role as a heartland of the Industrial Revolution and associated extraction activities;
- c. this in turn affects both the attractiveness of sites to developers and the viability of delivering new houses and other buildings; extensive decontamination and remediation must take place before development can be undertaken;
- d. open spaces within Sandwell's built-up area are in accessible and sustainable locations for the most part, but in themselves perform a vital role in helping to mitigate climate change, provide ecological corridors and a network of green spaces into and through Sandwell and improving the appearance and amenity of the borough, making it more attractive to investors and potential occupants;
- e. open spaces also provide opportunities for physical activity that help improve the health of Sandwell's population and offer them areas for quiet recreation that are beneficial for mental health reasons.

Preferred Option

- 7.27 The spatial strategy will set out the Council's commitment to creating and maintaining sustainable and healthy communities, through supporting the principles of sustainable development, whilst ensuring proposed development respects the environment. To achieve this, we must identify a preferred option for new development and growth in Sandwell that will deliver as much housing and employment growth as possible and protect local people's quality of life and health.
- 7.28 The existing urban area is the most sustainable location in terms of ease of access, infrastructure, services and facilities and is also the location for Sandwell's regeneration projects. Development in the towns and on the previously developed sites of Sandwell: -
- ensures the most efficient use of land;
 - supports current services and facilities and allows for opportunities to further develop and extend those provisions;
 - supports regeneration;
 - helps to preserve the borough's open spaces, sites with nature conservation value and land within the Green Belt.
- 7.29 We are facing significant environmental and climate change challenges, however, which must be addressed through the adoption of a strategic approach that helps to address and mitigate their worst impacts. We also need to address as a priority the health and wellbeing of Sandwell's residents. In Sandwell, this clearly means that we cannot and should not deliver new development in urban areas

that would mean the loss of green and open spaces, have adverse impacts on local environments and air quality, increase the risks of urban heat islands and result in the loss of opportunities for well-planned, liveable and active communities in favour of town cramming.

- 7.30 The largest area of open space in Sandwell is Sandwell Valley. Other major open spaces include the Rowley Hills and Sandwell's larger formal parks. Given the status of Sandwell Valley as green belt and the importance of existing parks and open spaces to local communities and environments it would be neither reasonable nor appropriate to consider them as locations for additional housing.
- 7.31 The table below sets out in more detail the results of the assessment of the four growth options and their relative levels of sustainability.

Spatial Growth Options

7.32 Following consideration of the above information and in view of responses received during the public consultation into the Issues and Options, stage, the following table has been used to assess the suitability of the four spatial growth options. The conclusions it contains are informed by the sustainability appraisal; further discussion of the various options can be found there.

Spatial Growth Option	Consistent with national policy?	Summary of Sustainability Appraisal Outcomes	Deliverability	Does it meet local needs and priorities ²⁸ ?	Conclusion
A - Balanced Growth	Consistent with the NPPF.	<p>Sustainability appraisal identifies this as the second most sustainable of the four growth options.</p> <p>It scores highly on biodiversity, climate change mitigation and adaptation, waste, transport and accessibility, housing, equality and economy.</p> <p>It is neutral on education and skills.</p>	<p>Likely to be deliverable. Development in town centres and on brownfield sites will usually represent the most deliverable and sustainable locations for development and help to facilitate the greatest level of infrastructure delivery with the widest community benefit.</p>	<p>Tackling climate change</p> <p>Housing need</p> <p>Protecting and enhancing the environment</p> <p>Supporting Sandwell's economy</p> <p>Infrastructure needs</p> <p>Regeneration</p>	<p>This offers a balanced approach to growth and delivery and will provide for a reasonable degree of sustainable growth. It is recognised as sustainable to locate development at settlements with access to good public transport. However, it does not offer the same capacity to deliver healthy communities and reduce pollution, both of which</p>

²⁸ Tackling climate change; Housing need; Creating healthy communities; Thriving towns; Supporting Sandwell's economy; Infrastructure needs; Protecting and enhancing the environment

Spatial Growth Option	Consistent with national policy?	Summary of Sustainability Appraisal Outcomes	Deliverability	Does it meet local needs and priorities ²⁸ ?	Conclusion
		It scores poorly on cultural heritage, landscape, natural resources, pollution and health.			are factors in dealing with climate change and improving the life chances and conditions of Sandwell's residents.
B - Green Growth	Partially – it fulfils many of the requirements of the NPPF in environmental and health-related terms but would not deliver the maximum available quanta of housing or employment development	Sustainability appraisal identifies this as the most sustainable of the four growth options. It scores very highly on biodiversity, climate change mitigation and adaptation, transport and accessibility. It scores highly on landscape, natural resources, pollution, housing, health, economy and education and skills.	Likely to be deliverable in part. Development in town centres and on brownfield sites will usually represent the most sustainable locations for development. However, it will not provide sufficient capacity for housing and employment development in the longer term.	Creating healthy communities Thriving towns Tackling climate change Housing need Protecting and enhancing the environment Supporting Sandwell's economy Infrastructure needs Regeneration	The most sustainable and environmentally valuable strategy but does not allocate the maximum available level of housing or employment land. However, it does meet the requirements for a green approach to growth in Sandwell and will support the delivery of climate change mitigation and adaptation, environmental protection

Spatial Growth Option	Consistent with national policy?	Summary of Sustainability Appraisal Outcomes	Deliverability	Does it meet local needs and priorities ²⁸ ?	Conclusion
		<p>It is neutral on waste and equality.</p> <p>It scores poorly on cultural landscape.</p>			and enhancement and the delivery of healthy communities.
C - Economic Growth	Partially – economic growth across the borough but will have negative environmental impacts and will not deliver sufficient housing development	<p>Sustainability appraisal identifies this as the least sustainable of the four growth options.</p> <p>It scores very highly on economy.</p> <p>It scores highly on transport and accessibility and housing.</p> <p>It is neutral on biodiversity, climate change mitigation and adaptation, equality and education and skills.</p> <p>It scores poorly on cultural heritage,</p>	This option is likely to be deliverable in narrow terms. However, housing need requirements will be better served over the plan period if there is more balance between it and economic growth across the borough	<p>Thriving towns</p> <p>Infrastructure needs</p> <p>Housing need</p> <p>Supporting Sandwell's economy</p>	This approach will deliver a significant degree of economic growth and will support the development of Sandwell's role as a centre of commercial activity. However, it will not deliver the environmental and community benefits of some of the other options and will have a negative impact on environment and health-related outcomes.

Spatial Growth Option	Consistent with national policy?	Summary of Sustainability Appraisal Outcomes	Deliverability	Does it meet local needs and priorities ²⁸ ?	Conclusion
		landscape, natural resources, pollution, waste and health.			
D - Housing Growth	Partially – housing growth across the borough but will have negative environmental impacts and will not meet the requirements for employment land provision	<p>Sustainability appraisal identifies this as the second least sustainable of the four growth options.</p> <p>It scores very highly on education and skills.</p> <p>It scores highly on climate change mitigation and adaptation, transport and accessibility and housing.</p> <p>It is neutral on biodiversity and equality.</p> <p>It scores poorly on cultural heritage, landscape, natural</p>	Housing supply is more likely to be deliverable and maintained over the plan period if a finer balance is struck between housing and economic growth across the borough.	<p>Thriving towns</p> <p>Infrastructure needs</p> <p>Tackling climate change</p> <p>Housing need</p> <p>Supporting Sandwell's economy</p>	This is similar to option C but will not deliver significant support to the plan's aims to improve the quality of life for its residents and protect and enhance its wider environment.

Spatial Growth Option	Consistent with national policy?	Summary of Sustainability Appraisal Outcomes	Deliverability	Does it meet local needs and priorities²⁸?	Conclusion
		resources, pollution, waste, health and economy.			

8 Spatial Strategy for Sandwell

- 8.1 It is evident that the implications of the four options would be impacted by the level and nature of any mitigation that may be secured or provided in connection with the development(s). How the options are carried forward will therefore also determine the implications in terms of wider sustainability considerations.
- 8.2 No single option would have no adverse environmental or sustainability impact; however, it is clear from the summary assessment that two options (Housing-led and Employment-led) would not support the balanced and sustainable mix of development and environmental and social benefits required to deliver transformational change in Sandwell. It is evident that the most appropriate and deliverable strategy for housing, employment and environmental protection and improvement in Sandwell, which will also confirm our ambitions to improve the health and wellbeing of residents, would be a combination of options A and B.
- 8.3 This will deliver what we are referring to as the **Balanced Green Growth** option for the delivery of development in Sandwell. It will allow us to provide a significant quantum of housing and additional employment opportunities in the borough while at the same time promoting a bold strategy supporting the delivery of climate change adaptation and mitigation, environmental protection and enhancement, the conservation and enhancement of the historic environment and the delivery of green and blue infrastructure. This in turn will support the Council's wider aims and objectives in improving the health (physical and mental), wellbeing and life chances of people in Sandwell.
- 8.4 The balanced green growth option will thus provide the quantum of development identified through adopting a strategic and realistic approach to what can be achieved given our constraints.

Balanced Green Growth

- 8.5 The strategic approach adopted in the SLP will help to deliver housing and economic growth between now and 2041 that fulfils the following obligations:
- to maximise climate change adaptation and mitigation through the creation, protection and improvement of parks, woodland and tree planting, open spaces, landscapes and habitats across the borough;
 - to protect areas of ecological value, valuable habitats and open spaces within and beyond urban areas;
 - to conserve the historic and archaeological environment and protect areas with geological and landscape value;
 - to create new public open spaces to serve new housing developments;
 - to promote the use of zero- and low-carbon designs, building techniques, materials and technologies in all new development;
 - to deliver as much new development as possible on previously developed land and sites;

- to allocate housing in locations with the highest levels of sustainable transport access to residential services (retail provision, schools, healthcare facilities, fresh food, employment etc.);
- to regenerate existing housing and employment areas and help them deliver: -
 - a) cleaner, more energy-efficient and more intensive areas of growth;
 and
 - b) improvements to the environmental, climate change, accessibility and socio-economic capacity of existing residential and employment areas
- to allocate new employment land where sustainable access and good public transport links are available;
- to take advantage of existing and improved infrastructure capacity to maximise development on new sites.

8.6 The Balanced Green Growth option will therefore form the basis of the Sandwell Local Plan's Development Strategy (Policy SDS1) and will also inform the aims and objectives of the strategic and local policies in the rest of the plan. The resultant spatial strategy is considered to offer a positive, deliverable and sustainable approach to meeting our development needs for the plan period. It has been informed by Sustainability Appraisal and reflects local priorities and national policy, including the NPPF.

8.7 The emerging spatial strategy is crucial in shaping the pattern of growth that will occur over the plan period and has formed the basis for the allocation of strategic sites across Sandwell at the Regulation 18 stage of the local plan's preparation. It will also help to ensure that the planned housing and employment growth is supported by appropriate investment in the infrastructure needed to create sustainable communities.