



**SANDWELL LOCAL PLAN - EXAMINATION IN PUBLIC
OCTOBER 2024**

TOPIC PAPER – DENSITY AND DESIGN

This document is one of a series of topic papers which have been produced to support the Sandwell Local Plan (SLP). The document sets out the approach the Local Plan takes in relation to density targets for residential development and urban design.

Density targets for residential development

Existing density standards

The current minimum net residential density requirement for Sandwell is set out in Policy HOU2 of the Black Country Core Strategy. The policy requires that all developments aim to achieve a minimum net density of 35 dwellings per hectare, except where higher densities would prejudice historic character and local distinctiveness.

Table 8 within the supporting text to the policy details the locations in which higher densities are appropriate, with reference to accessibility standards. The table clarifies that very high densities of 60+ dwellings per hectare are only appropriate within a strategic or town centre.

National Planning Policy Framework (2023)

The National Planning Policy Framework (NPPF) sets out national policy relating to the efficient use of land and residential densities at paragraphs 128-130.

Paragraph 128 states that planning policies should support development that makes efficient use of land, taking into account:

- “a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) local market conditions and viability;*
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) the importance of securing well-designed and beautiful, attractive and healthy places.”*

Paragraph 129 is clear that *“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.”* It goes on to clarify that plans should optimise the use of land and meet as much identified need for housing as possible. Minimum density standards should be set for town centres and other locations well served by public transport, and these standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. Minimum density standards may also be considered for other parts of the plan area.

Paragraph 130 explains that *“significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. Such circumstances should be evidenced through an authority-wide design code which is adopted or will be adopted as part of the development plan.”*

[Planning Practice Guidance and the National Model Design Code](#)

Planning Practice Guidance (PPG) suggests that the following matters should be considered when establishing appropriate densities on a site or in a particular area (Reference ID: 66-004-20190722):

- Accessibility measures such as distances and travel times to key facilities and public transport nodes;
- Characterisation studies and design strategies;
- Environment and infrastructure assessments, such as the capacity of services and presence of environmental risks; and
- Assessments of market or site viability.

The National Model Design Code provides guidance on how coding can be used to ensure development makes an efficient use of land and residential densities are appropriate to their location.

[Greater Birmingham HMA Strategic Growth Study \(2018\) \[document ref. HOU 007\]](#)

The Greater Birmingham and Black Country HMA Strategic Growth Study 2018 identifies the scale of unmet housing need arising from the Housing Market Area (HMA) and considers strategic development options and broad locations for addressing the housing land supply shortfall.

Paragraph 1.33 of the Strategic Growth Study assumes that minimum densities of 40dph are achieved in the Birmingham and Black Country conurbation, with minimum densities of 35dph in other parts of the HMA. This approach would yield additional supply of 13,000 dwellings, principally over the period to 2031, making a significant contribution to meeting the housing shortfall across the region and reducing the extent of Green Belt and countryside release required to meet the shortfall.

[The Black Country Plan: Assessment of the Potential for Additional Brownfield Land Development Capacity \(2022\) \[document ref. WMCA 001\]](#)

The West Midlands Combined Authority commissioned Chilmark Consulting Ltd to undertake an independent and objective assessment of the brownfield land capacity for housing in the Black Country. The purpose of the assessment was to verify whether the Regulation 18 draft version of the since abandoned Black Country Plan had taken all reasonable steps to maximise the identification of housing land supply on brownfield sites within the plan area before proposing green belt and greenfield release and the exportation of housing need to the wider HMA.

In respect of housing site density assumptions, Chilmark Consulting concluded that the density policy requirements proposed in the draft Black Country Plan (minimum densities of 40, 45 or 100 dwellings per hectare depending on the location and level of accessibility) were reasonable to ensure that a mix of dwelling types and sizes could be delivered as well as making the most effective use of available land. The proposed minimum density requirements were an increase from the level established in Policy HOU2 of the Black Country Core Strategy and aligned with the NPPF which sought to establish and raise minimum residential density standards especially where these were aligned to good accessibility to key services, jobs and facilities. Chilmark Consulting concluded that the density assumptions did not need to be altered and recommended that a fuller and more effective justification for the density requirements was set out in the next iteration of the

Black Country Plan including a demonstration of how proposed site allocations reflected the minimum densities sought for development after 2024.

[Sandwell Strategic Housing Land Availability Assessment \(2024\) \[document ref. HOU 003\]](#)

The Sandwell Strategic Housing Land Availability Assessment (SHLAA) 2024 assesses the housing potential of land in the borough. Where sites have already been subject to a detailed appraisal (such as through a planning application or development brief), the net developable area has already been established.

Where the expected residential yield for a site that is over 2 hectares has not already been established the yield is calculated using the following formula¹:

$$\text{yield} = \text{density} \times \text{site area} \times \text{percentage of the site which is developable} \\ \times \text{gross:net ratio}$$

The formula has been applied because on larger sites more land is required for open space, local services and access. It is anticipated that for sites over 2 hectares, approximately 75% of the site would be developed, with 25% allowed for supporting infrastructure. In other words, the net developable area on sites over 2 hectares is estimated to be 75% of the gross site area. It should be noted that the net developable area and yields may be affected by other issues on a site-by-site basis, such as ground conditions in certain parts of sites.

[Sandwell Urban Capacity Appraisal \(2024\) \[document ref. HOU 006\]](#)

The Sandwell Urban Capacity Appraisal sets out the approach that the SLP has taken to allocate sufficient land to meet the development needs of the borough over the plan period. The Appraisal notes that despite an exhaustive search for sites that there is insufficient land to meet objectively assessed housing needs.

The review of the Black Country Plan included an estimate of the potential uplift in housing capacity that could be achieved through the adoption of higher densities.

This has also been explored in the emerging Sandwell Local Plan. Densities have been increased so that the Publication Plan now requires minimum densities of 100dph (e.g. flatted development) within town centres and other identified locations, 45dph in areas where accessibility allows for a high-density development and 40dph in areas with moderate levels of accessibility. Locations where a minimum density of 100dph should be achieved has broadened from the requirement proposed in the Black Country Plan. In addition to locations within Strategic and Town Centres, the SLP requires minimum densities of 100dph where the relevant accessibility standards are met and the site is:

- identified for very high-density housing within a masterplan and / or design brief agreed with the council; or
- considered suitable for very high-density housing in accordance with guidance in the council's Design Code.

A density uplift assessment was undertaken of Sandwell's identified SHLAA sites as part of the SLP review. Since that assessment, sites of two or more hectares have had their yield calculated in line with a formula set out in the latest SHLAA, which reduces the capacity on relevant sites. These and other sites that are unlikely to have gained planning permission by

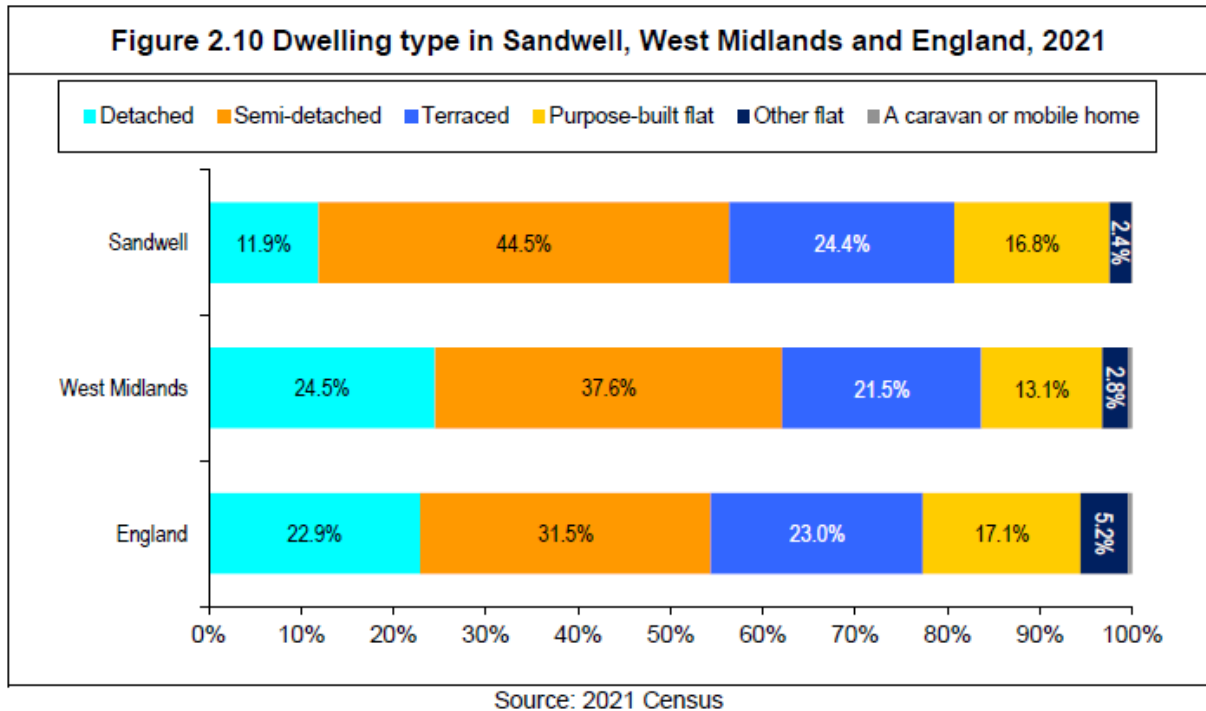
¹ Formula from Sandwell Strategic Housing Land Availability Assessment (2024)

2025 and that have a capacity of ten homes, or more were then assessed with regards to a density uplift.

This has meant that where a density uplift would have increased the capacity, introducing the yield calculation has led to a neutral impact on capacity overall.

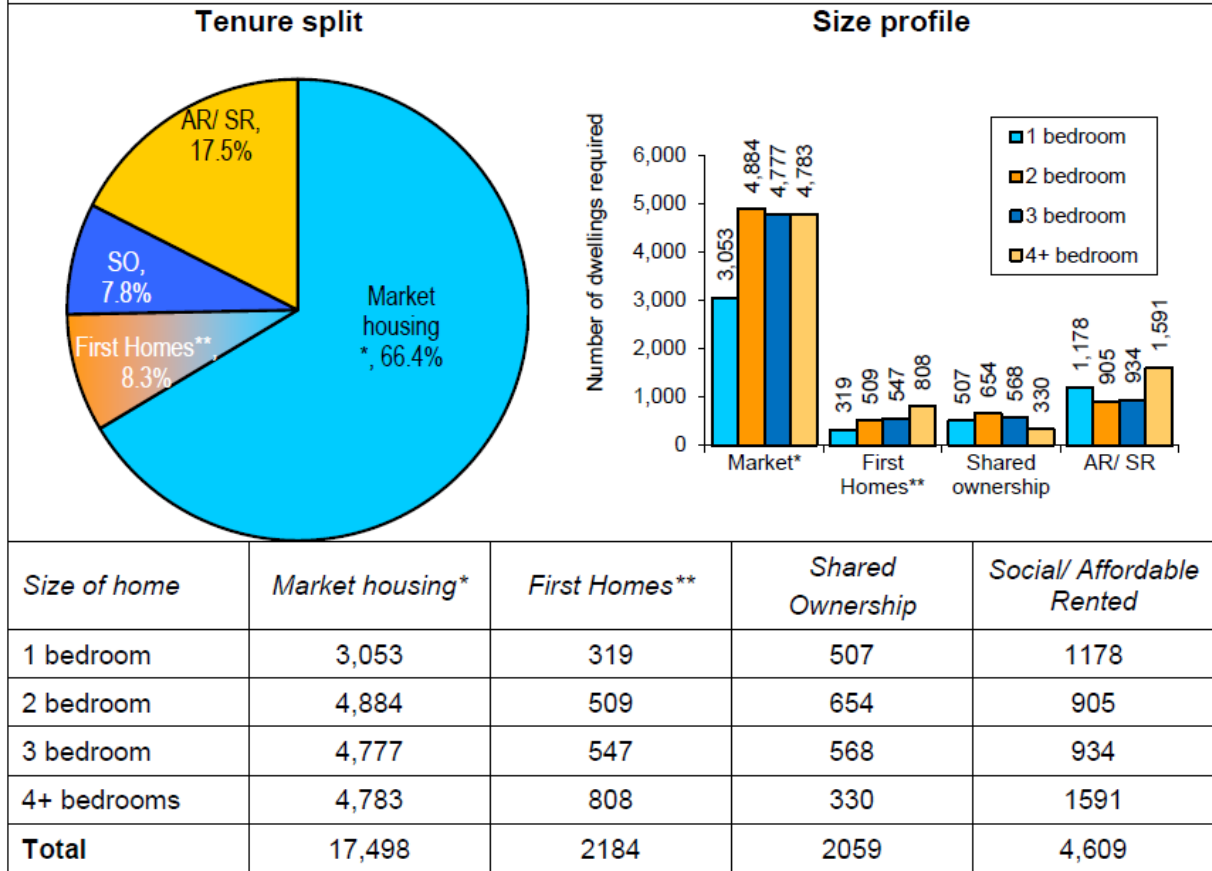
Future Housing Mix

The Sandwell Housing Market Assessment Update (SHMA) 2024 assesses the need for different housing types and tenures over the plan period to 2041. It provides important evidence on the need for different dwelling sizes.



The SHMA explains that there were 134,758 dwellings in Sandwell in 2021. Figure 2.10 above shows that over 80% of the existing dwelling stock comprises houses, with just under 20% comprising flats.

Figure 5.2 Profile of new accommodation required in Sandwell



*Market housing includes both owner-occupied and private rented **First Homes figures represent potential demand rather than a requirement. These figures represent the distribution of housing that should be delivered.

The SHMA indicates that development proposals should deliver a range of dwelling sizes to meet the borough’s needs. Almost half the need is for 1- and 2-bedroom dwellings, some of which could be met through the creation of new flats.

[Sandwell Local Plan Viability Appraisal \[document ref. VIAB 001 and VIAB 002\]](#)

The Sandwell Local Plan Viability Appraisal and Addendum (November 2023 and September 2024) include a series of absolute market value assumptions for different housing sizes and typologies in Sandwell, as well as construction cost assumptions reflecting BCIS² figures. In broad terms, the assumptions indicate that houses typically have lower BCIS costs and higher market values per unit than apartments.

The Viability Appraisal concludes that, even when adopting a pragmatic approach, many residential sites in Sandwell have marginal viability or are unviable, meaning that public intervention or other factors are required to secure delivery.

Therefore, the balance between housing and apartments on residential schemes can impact viability and deliverability, and an equilibrium must be found between securing the highest minimum density standards in the Local Plan and ensuring housing development can come

² BCIS (the Building Cost Information Service) provides independent cost data to the UK built environment industry.

forward. This is necessary to ensure that the Local Plan is positively prepared and effective and is found sound at examination.

Existing achieved densities

Appendices 1 and 2 of this paper set out an analysis of existing residential densities in different parts of the borough with housing stock of varying ages, and analysis of recently consented and constructed schemes.

The analysis shows that in Sandwell:

- areas of terraced Victorian houses and modern areas of townhouses achieve high densities exceeding 45 dwellings per hectare;
- housing from the mid-20th Century often benefit from larger plots and consequently tend to achieve lower densities; and
- there are examples of recently consented and constructed schemes achieving a range of densities, including densities exceeding 100 dwellings per hectare. Several schemes including a mixture of houses and flats have achieved densities exceeding 45 dwellings per hectare.

SLP policy approach

The NPPF and supporting evidence for the SLP is clear that minimum density targets must be increased from the level set out in the Black Country Core Strategy to assist with:

- meeting identified housing needs for the SLP plan period;
- reducing the amount of unmet housing need arising from Sandwell and the wider HMA;
- preventing inefficient use of land; and
- preventing new homes being built at low densities.

Policy SH03 in the emerging Sandwell Local Plan sets out the proposed density targets for residential development. The policy provides minimum targets that will allow higher density schemes to come forward where accessibility standards are met, and the proposal is consistent with other Local Plan policies and material considerations.

The viability evidence for the SLP indicates that even when adopting a pragmatic approach many residential sites are of marginal viability or are unviable without public intervention, and that housing development typically has better viability than flatted development. Setting unrealistically high minimum density targets could impact the delivery of housing and result in planning policies that are not effective.

Policy SHO3 - Housing Density, Type and Accessibility

- The density and type of new housing provided on any housing site should be informed by:
 - the need for a range of types and sizes of accommodation to meet identified local needs;
 - the level of accessibility by sustainable transport to residential services, including any improvements to be secured through development, as set out in Table 6; and
 - the need to achieve high-quality design, to mitigate and adapt to climate change. and minimise amenity impacts, considering the characteristics and mix of uses in the area where the proposal is located.
- The council will aim to provide an overall mix of house types over the plan period, tailored to best meet local needs and will support development that creates mixed, sustainable and inclusive communities. Developments of ten homes or more should provide a range of house types and sizes that will meet the accommodation needs of both existing and future residents, in line with the most recently available information.
- All developments of ten homes or more should achieve the minimum net density, on the net developable area, set out below, except where this would prejudice historic character and local distinctiveness as defined in Policy SHE2:

100 dwellings per hectare where Table 6 accessibility standards for very high-density housing are met and the site is:

located within a Strategic or Town Centre detailed at Table 10;
 identified for very high-density housing within a masterplan and / or design brief agreed with the council; or
 considered suitable for very high-density housing in accordance with guidance in the council's Design Code.

45 dwellings per hectare where Table 6 accessibility standards for high density housing are met;

40 dwellings per hectare where Table 6 accessibility standards for moderate density housing are met.

- Table 6 provides details of the appropriate density and, where appropriate, house type mix, to be sought on each housing allocation site, in accordance with the requirements set out in this Policy. Further details of design requirements for housing developments will be set out in Sandwell's Design Codes.

Table 8 - Minimum Housing Densities and Accessibility

Density (homes per hectare net)	Very High: 100 +	High: 45 +	Moderate: 40 +
Indicative proportion of flats	100%	>15%	0 – 15%
Indicative amount of housing suited to families	low	medium	high
Accessibility (by either walking or public transport, unless stated)			
Employment - Strategic Centre or other employment area	20 mins	20 mins	30 mins
Health – Primary Care e.g., GP Surgery or Health Centre	10 mins	10 mins	15 mins
Fresh Food - Centre or food store	n/a	10 mins	15 mins
Education - Primary School (walking distance only)	n/a	15 mins	10 mins
Education - Secondary School	n/a	25 mins	20 mins

1. Any development that fails to make efficient use of land, by providing a disproportionate number of large, 4+ bedroom homes when compared with evidenced local housing need, will be refused in accordance with the requirements of this policy.
2. Development proposals should be consistent with other Local Plan policies.

Urban Design

The SLP sets out high-level design policies and confirms that a Design Code will be prepared which will provide the primary guidance resource for anyone wishing to undertake development in the borough. Summaries of two of the relevant policies are set out below:

SDS5 – Achieving well-designed places

The policy explains that a Design Code will be produced which new development will be expected to adhere to. New buildings should be appropriate and integrate well to their area. Innovative design and climate-sensitive approaches will be supported. The policy supports measures to facilitate permeability and accessibility, support safe neighbourhoods and contribute to integrated and well-connected multifunctional open spaces.

SDM1 – Design quality

The policy seeks to create a strong sense of place and ensure development reflects Sandwell's unique character. It requires development proposals to demonstrate that consideration has been given to:

- a) The National Design Guide,
- b) Manual for Streets,
- c) Building for a Health Life criteria, Sandwell's Design Code and masterplans,
- d) Crime prevention measures like Secured by Design and/or Park Mark principles, and
- e) The agent of change principle in the NPPF.

The policy requires proposals to contribute to the greening of Sandwell as well as preventing adverse impacts on the living environment of occupiers existing or future residential properties. It supports the provision of public art in appropriate places.

There are many other policies within the SLP that relate to urban design, including:

- SNE3 – Provision, retention and protection of trees, woodlands and hedgerows
- SNE6 – Canals
- SHE1 – Listed buildings and conservation areas
- SHE2 – Development in the historic environment
- SHE3 – Locally listed buildings
- SHE4 – Archaeology
- SCC2 – Reducing operational carbon in new build non-residential development
- SCC3 – Climate-adapted design and construction
- SCC4 – Embodied carbon and waste
- SCC5 – Sustainable drainage
- SHW4 – Open space and recreation
- SHO3 – Housing density, type and accessibility
- SH05 – Delivering accessible and self/custom build housing
- SEC6 – Relationship between industry and sensitive uses
- SWB1 – West Bromwich Town Centre
- SWB2 – Development in West Bromwich

- SDM2 – Development and design standards
- SDM3 – Tall buildings and gateway sites
- SDM4 – Advertisements
- SDM6 – Shop fronts and roller shutters

Collectively, the policies seek to ensure that development in Sandwell is of a high design quality and responds positively to technical considerations. Particular emphasis is placed on minimising the impacts of and adapting to climate change, creating multifunctional open space, and nature recovery. This responds to the SLP spatial strategy of delivering balanced green growth and reflects to the extensive evidence base including reports on Climate Change, the Open Space Assessment and the Local Nature Recovery Strategy.

Appendix N of the SLP sets out the existing policies and plans which will be replaced once the new Local Plan is adopted. It shows that existing design policies and guidance will be comprehensively replaced by policies within the SLP, with further detail to be provided within the future Design Code.

The policies sit within the context of a variety of national and regional publications, notably the National Design Guide and National Model Design Code, which are referenced in the NPPF and can constitute a material consideration in the determination of planning applications. The National Design Guide details ten characteristics of well-designed places and the National Model Design Code provides detail guidance on the production of design codes, guides and policies.

Sandwell Council is at the early stages of preparing a Design Code for the borough. Work on the Design Code is expected to commence in early 2025 and take 12-18 months to complete. It will be prepared as either a Supplementary Planning Document or a Supplementary Plan, depending on whether Government enacts secondary legislation relating to the Levelling Up and Regeneration Act (2023) to introduce Supplementary Plans.

Once it has been adopted the Design Code will replace the Council's Residential Design Guide SPD as well as providing design coding. The Design Code will cover a range of topics which could include sustainability, nature recovery and tall buildings.

Appendix 1: Review of existing residential densities

Three Shires Oak Road / Lightwoods Road / St Mary's Road / Milcote Road, Bearwood

Dense terraced Victorian era housing. Predominantly 2 or 2.5 storeys with shallow front curtilages, narrow back gardens (15-20 metres long) and no back alley. Car parking almost entirely on street.

111 registered residential addresses

17,658sqm (1.77ha) net area
= 62.7dph



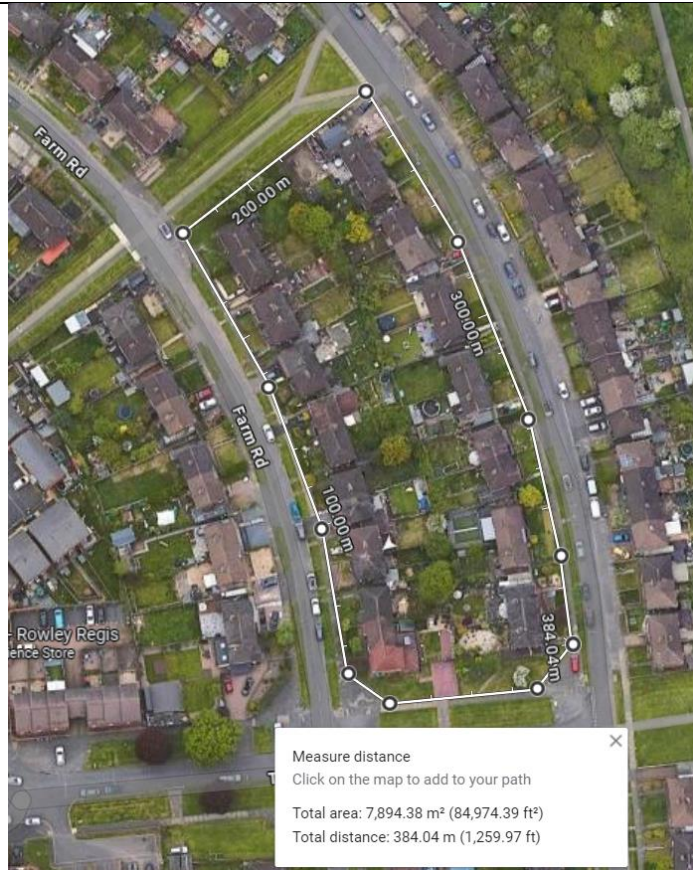
Brickhouse Road / The Avenue / Farm Road / Footpath, Cradley Heath

Semi-detached post-War municipal housing. Predominantly 2 storeys with generous gardens, particularly on corner plots. Designed with on street car parking, although some properties retrofitted to accommodate parking within front gardens.

28 registered residential addresses

7,894sqm (0.79ha) net area

= 35.4dph



Kyngston Road / Marnham Road / Bassett Crescent, West Bromwich (Churchfields)

Detached, semi-detached and terraced and flatted housing from the 2010s. A mixture of 2 and 2.5 storeys and flats. Shallow front curtilages with individual back gardens. Dedicated parking on plot or within shared courtyard

22 registered residential addresses

4,983sqm (0.50ha) net area

= 44.0dph



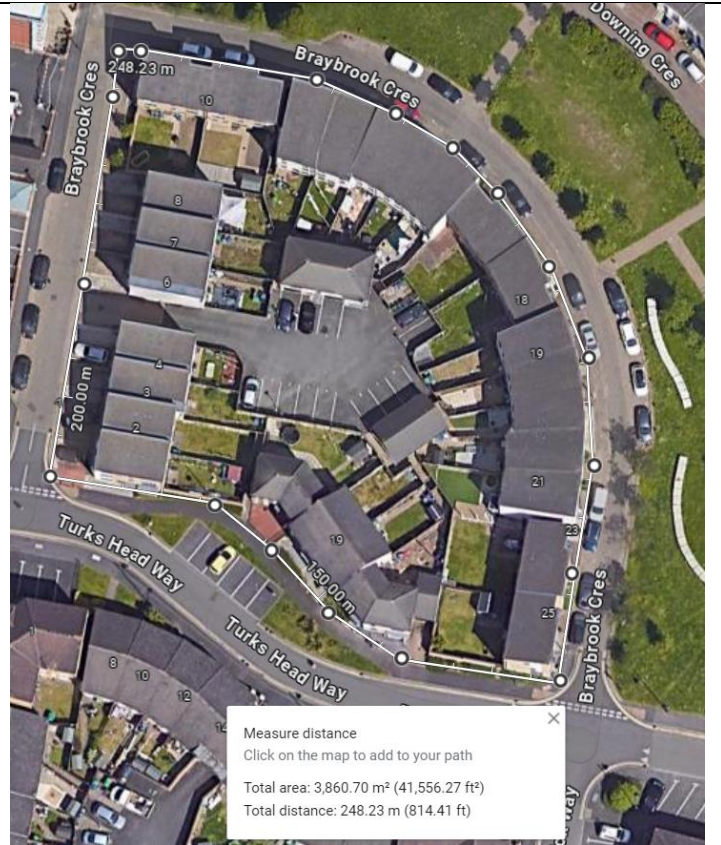
Braybrook Crescent / Turks Head Way, West Bromwich (The Lyng)

Terraced town houses from 2014/15. Predominantly 3 with some 2 storey properties. Very shallow front curtilages with compact individual back gardens. Parking provided within garages at ground floor level, garage buildings or shared courtyard. Some residents opting to park on the pavement outside their property.

28 registered residential addresses

3,861sqm (0.39ha) net area

= 71.8dph



Appendix 2: Review of densities for recently consented and/or constructed residential schemes

Address	Planning ref.	Gross site area (ha)	Net developable area (ha)	Units							Dwellings per hectare	Parking space	Parking ratio	Year completed	Developer
				Studio	1-bed	2-bed	3-bed	4-bed	5-bed	Total					
Victoria Court, 4-10 Victoria Street, West Bromwich	DC/16/59740	0.11	0.11	0	35	14	0	0	0	49	445.45	9	0.18	2020	DRD Victoria
Former Tentec Limited Plymouth House Guns Lane West Bromwich B70 9HS	DC/22/67454	0.59	0.59	10	76	35	4	0	0	125	211.86	60	0.48	N/A	TBD
Former United Springs Limited New Swan Lane West Bromwich B70 0NT	DC/17/60621	1.24	1.24	0	2	56	12	0	0	70	56.45	98	1.4	2022	Woodbourne Group
Land at Woods Lane /Cradley Road Cradley Heath	DC/18/62535	3.23	2.42	0	24	75	30	6	0	135	55.79	190	1.41	2022	Vistry Partnership
Land at Hall Green Road, West Bromwich	DC/20/65059	8.59	5.6	0	0	34	151	38	0	223	39.82	445	2.00	2024	Countryside Partnerships
Land north of Woods Lane / Cradley Road Cradley Heath B64 7AW	DC/21/66444	0.72	0.69	0	4	15	15	0	0	34	49.28	55	1.62	2024	Keon Homes
Land at Jervoise Street, Claypit Lane, Coppice Street, Wattle Road West Bromwich	DC/13/55595	4.29	4.29	0	1	76	84	35	1	197	45.92	323	1.64	2014	Kier Partnership Homes
Land at West Bromwich Street Oldbury B69 3AT	DC/20/64152	6.02	5.3	0	35	97	74	28	0	234	44.15	386	1.65	2024	Lovell Homes
Site of Nos 208-302 Beaconview Road West Bromwich	DC/11/53514	0.95	0.95	0	0	22	12	4	0	38	40	68	1.79	2014	Accord Group

