



Delivering a thriving, growing and active Borough

SANDWELL LOCAL PLAN

Issues and Options Review

Public Consultation
6th February – 20th March 2023



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1. SANDWELL LOCAL PLAN REVIEW

Sandwell Council is starting the process of reviewing its current local plan. This currently consists of :-

- the Black Country Core Strategy (BCCS) (adopted 2011)
- the Sandwell Site Allocations and Delivery Development Plan Document (SAD) (adopted 2012)
- the West Bromwich Area Action Plan (WBAAP) (adopted 2012)
- the Tipton Area Action Plan (adopted 2008)
- the Smethwick Area Action Plan (adopted 2008)

The Government requires all local councils to produce a long-term plan that sets out a vision for their area. It should identify where and how development should take place in the future. This document is known as a local plan.

1.1. What is a Local Plan?

A Local Plan shows how an area will develop in the future and provides policies that will guide decisions on whether planning applications are granted. Sandwell's new local plan (the Sandwell Local Plan or SLP) is intended to support high-quality development in the right locations to meet future needs whilst also protecting and enhancing the natural and built environment for residents, businesses and visitors.

A local plan therefore sets out all the planning policies and proposals for an area. It addresses needs and opportunities in relation to housing and the economy, whilst ensuring that we have sufficient community facilities and infrastructure to support a growing population. It also contains policies to safeguard the natural and historic environment, mitigate and adapt to climate change, and achieve well-designed neighbourhoods.

1.2. Background to Review

The documents that make up the current Sandwell Local Plan, adopted in 2008 - 12, cover the period 2006 -2026. The new Local Plan must cover a minimum period of 15 years following adoption and should identify the scale of development and the key locations to meet this need during this plan period. The Council could decide to plan for a longer time frame if it considers it appropriate to do so. The timetable for production of the Local Plan sets out likely adoption of a new plan by 2025, and so based on this, the Local Plan will need to run until at least 2041.



1.3. The Review Process

The first part of this review process is to involve local people, businesses and other stakeholders in identifying what the new local plan should address, in a scoping exercise known as the **Issues and Options Review**. This is also known as the Issues and Options stage. Here, you tell us how you would want us to tackle the important land use and related matters that will affect the future of our borough. This doesn't just mean considering housing development, although the scale and location of future growth are important considerations. It also involves thinking about issues around the environment, jobs, centres, transport and infrastructure. Your answers will be considered alongside a detailed technical evidence base that we will put together and use to carry out further analysis of the main issues.

Together, this evidence-gathering and analysis will help to create a sound base for the new Sandwell Local Plan.

We want you and other interested stakeholders to get involved in providing comments and information so that the SLP can benefit from your local knowledge and lived experience of Sandwell.

In this document, we introduce various land use and planning-related issues that we think may be important in Sandwell. We would like to hear your views on these matters and have posed some questions along the way to help focus the discussion. Your responses to those questions will help us recognise what matters to local people.

The process of producing a local plan is summarised below.

1.4. Local Plan preparation

1. Gather evidence

The council conducts a range of detailed studies and considers everything a Local Plan needs, like how many new homes and jobs are needed and what supporting infrastructure is required.

2. Issues and options stage

The council considers the ways future development needs could be met and asks the public and other stakeholders to comment on these key issues as well

3. Draft Plan Consultation (Regulation 18)

The council reviews responses received following the Issues and Options stage and publishes a draft Local Plan for further public consideration and comment

4. Submission Plan Consultation (Regulation 19)

Comments made on the draft plan are then used to amend it further and prepare a revised version. The revised draft Local Plan is published for representations to be submitted on its 'soundness'¹.

5. Examination in public

The Secretary of State appoints an Independent Planning Inspector to examine the draft Local Plan in detail. Public hearing sessions are held during this stage.

6. Adopt the Local Plan

The Planning Inspector's final report recommends whether the council can adopt the plan. Once adopted, the Local Plan will be used to make decisions on all planning applications.

¹Soundness is a consideration of how robust, reliable and accurate a local plan is.

1.5. What is the purpose of this document?

This Issues and Options document is the first consultation stage in the local plan process. It provides an opportunity for you to get involved in developing our future local plan and to offer your thoughts and comments on how you think we should address some of the key issues that our borough faces.

1.6. Format of the Issues and Options document

This document identifies some of the borough's key issues under a series of specific topic areas. There are questions alongside each section, where you are invited to respond to the matters being raised. Some questions are specifically open-ended, and some set out potential alternative solutions (options) for you to consider and comment on. We very much encourage public input on whether there are any other options that could help to meet Sandwell's needs.

You are welcome to comment on every issue, or alternatively, to just focus on the ones that specifically interest you. A few of the questions raised relate to technical matters, but most do not, and we are interested in your comments on all the topics included.

Feedback will be collated and analysed to inform the next stage of the process, where Sandwell's new local plan will begin to take shape. There will be further opportunities to get involved at each stage and to comment on new policies and proposals as they emerge.

If there are any other issues around land use and development you think the new plan should include that we haven't covered, this is also your opportunity to bring these to our attention.

The Issues and Options consultation does not identify potential development sites or draft policy wording – these will follow once all the public responses have been considered. A draft SLP containing site allocations and new policies will be the subject of further public consultation later this year.



1.7. How you can submit your comments

Comments must be made in writing, electronically or by hand. You can submit your comments to us in several ways. Electronic responses are preferred but there is the opportunity for you to write to us if you prefer:

- **Online**

Complete the form online using the link on our website

https://www.sandwell.gov.uk/info/200317/planning_policy/4990/sandwell_local_plan

- **By Email**

Download and complete the online version of the form and return it by email to us at Sandwell_LocalPlan@sandwell.gov.uk

- **In writing**

A small number of hard copies of the form will be made available at libraries, together with a copy of the document. Responses should be sent to:

**The Planning Policy Team,
Sandwell Council,
PO Box 2374,
OLDBURY
B69 3DE**

The closing date for responses is **5pm on 20th March 2023**. Any responses that are received after this time may not be considered.

1.8. What happens next?

This issues and options document is part of the local plan process. Your feedback will be collated and analysed to inform the next stage of the process, where Sandwell's new local plan will begin to take shape. There will be further opportunities for you to get involved at each stage and to comment on new policies and proposals as they emerge.

1.9. The Timeline for the Local Plan Review

The timescale for the production and eventual adoption of the new Sandwell Plan is set out below:

Date	Action
6th Feb – 20th March 2023	Six-week Issues and Options consultation and Call for Sites.
March – Aug 2023	Evidence refresh and Draft Plan preparation.
Oct - Dec 2023	Six-week Draft Plan consultation.
Jan – June 2024	Consideration of representations and Submission Plan preparation.
Sep – Oct 2024	Six-week Submission Plan consultation.
Nov 2024	Submit the Plan and representations to the Secretary of State.
Dec 2024 – Summer 2025	Window for holding the Examination in Public followed by Inspector's report
Late 2025 - early 2026	Adoption at Full Council

This is a tight timetable but will ensure the review of the Local Plan is delivered as soon as possible. The review process will inevitably be subject to outside forces, including any new national planning legislation that may be introduced, political activity at either a local or national level and other unforeseen circumstances. However, we will do our best to ensure the SLP meets this schedule.



1.10. The National Policy Context

The National Planning Policy Framework 2021 (NPPF) requires local councils to deliver sustainable development, which is summarised as development meeting the needs of the present without compromising the ability of future generations to meet their own needs. This requires balancing economic, social and environmental objectives, which should be delivered in complementary ways.

National policy also requires local planning authorities to prepare design guides or codes that reflect local character and design preferences, to set out expectations for development at an early stage. Design guides and codes can vary in their geographic coverage and their level of detail.

The Local Plan must consider the guidance set out by national government in the NPPF and other relevant policies and proposals. This means Sandwell's new local plan is required to effectively reflect these external requirements unless there is sufficient local evidence to demonstrate a different approach is justified.

The Government has published proposals for an update of the NPPF² (during December 2022), which is subject to public consultation until March 2023. Although proposed changes to the NPPF (including the introduction of National Development Management Policies) will not impact on this current Issues and Options procedure, it will become necessary for us to consider and reflect the changing legislation as we move through the local plan adoption process. As a result, the draft stage of the SLP and the subsequent publication version of the plan will incorporate the emerging requirements of the new NPPF.

1.11. The Sub-Regional Context

Prior to the publication of this Issues and Options document, Sandwell was closely involved in the production of a replacement for the original Black Country Core Strategy, in the form of the Black Country Plan, alongside the other three Black Country councils. Work on the production of the joint BCP officially ceased in October 2022.

Given the work that had already been undertaken on the plan, both in terms of evidence gathering and policy writing, and the fact that it had been through significant public consultation, we have decided that there is merit in retaining and adapting some of the policies for our new plan in Sandwell. The other Black Country councils are likely to be doing the same; including similar or shared policies on certain issues such as pollution, transport, nature networks and other more strategic aspects of land use will make it much easier to ensure those matters are dealt with in a more effective way across boundaries.

Sandwell's local plan will therefore include policies previously seen and consulted on in the BCP and will adapt those policies to make them more specific to our borough.

A list of the former BCP policies (several of which are very likely to be amended and reused in the SLP) is included at the end of this document (Appendix A).

The BCP policies will be incorporated into the draft SLP when it is published for public consultation. The SLP will also rely on some of the evidence gathered for it, where this remains relevant and up-to-date, and will respond to some of the issues raised by the public and others during the public consultation on the draft BCP (held during October – November 2021).

²<https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>

NOTE: *As the issues and options for the BCP policies have already been explored during various stages of public consultation, the policies they resulted in are not included in this initial consultation exercise. However, the BCP policies that are subsequently reused in the draft SLP will be subject to further public consultation at later stages of this plan's preparation.*

This Issues and Options document is intended: -

- to identify matters where Sandwell Council feels more specific consideration is needed in a Sandwell context; and
- to get the broad views of local communities / stakeholders on issues of importance to them.
-

1.12. The Local Context

The Sandwell Local Plan, once it is adopted, will help to deliver the Council's priorities across a range of policy areas through supporting sustainable development and appropriate land use.

Every local plan is required by current legislation to identify strategic priorities for the use of land in its area. This is often achieved in part through setting out a clear Vision describing what the authority wants to accomplish through its approach to land use and development and how and where it sees the borough progressing if those priorities are met.

The SLP's Vision will be guided by, and echo the priorities identified in other adopted Council strategies. This will ensure that land use decisions can reflect and support the delivery of council services and functions across the whole borough and in different areas of impact.

The Council will use the new SLP policies, and additional guidance based on those policies, to assess planning applications and guide its decisions on:

- the type of development needed in the borough;
- the standards that new development should meet;
- what it should look like – its design and appearance;
- what services and infrastructure are needed, and where;
- how residents will benefit from growth and development.

1.13. Links with the Corporate Plan

The main purpose of Sandwell Council's Corporate Plan 2021 - 2025³ 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.

³https://intranet.sandwell.gov.uk/downloads/file/13179/corporate_plan_2021-2025

The council's **Sandwell Vision 2030**⁴ is as follows:

It's where we call home and where we're proud to belong - where we choose to bring up our families, where we feel safe and cared for, enjoying good health, rewarding work, feeling connected and valued in our neighbourhoods and communities, confident in the future, and benefiting fully from a revitalised West Midlands.

The Sandwell Vision 2030 also sets out ten ambitions for a successful Sandwell and what it will look like, all of which will have direct or indirect relevance to the aims of the new SLP. These are included in the Vision 2030 document, available to view on our website, but they are briefly set out below together with an explanation of the role the SLP will play in meeting them.



Ambition 1: Sandwell is a community where our families have high aspirations and where we pride ourselves on equality of opportunity and on our adaptability and resilience.

SLP relevance: promoting and supporting sustainable development that helps to meet local need / demand; provides for sufficient services and facilities in locations accessible to all in Sandwell's communities; delivers a healthy supply of land for economic growth and employment; deliver strong policy support to combating climate change adaptation and mitigation; protect and enhance the natural environment, nature conservation and open spaces; deliver opportunities for biodiversity net gain, landscaping and tree planting.



Ambition 2: Sandwell is a place where we live healthy lives and live them for longer, and where those of us who are vulnerable feel respected and cared for.

SLP relevance: protecting, enhancing and making accessible land for sport, leisure and active and passive recreation; providing clear policy support for development aimed to deliver health and welfare infrastructure.



Ambition 3: Our workforce and young people are skilled and talented, geared up to respond to changing business needs and to win rewarding jobs in a growing economy.

SLP relevance: delivering a healthy supply of land for economic growth and employment.



⁴ <https://www.sandwell.gov.uk/Vision2030>



Ambition 4: Our children benefit from the best start in life and a high-quality education throughout their school careers with outstanding support from their teachers and families.

SLP relevance: provides land and sites for sufficient services and facilities in locations accessible to all in Sandwell's communities including schools, colleges and opportunities for higher education.



Ambition 5: Our communities are built on mutual respect and taking care of each other, supported by all the agencies that ensure we feel safe and protected in our homes and local neighbourhoods.

SLP relevance: promotes the development and improvement of attractive, safe and accessible public realm, support services and community infrastructure as part of new development and project delivery.



Ambition 6: We have excellent and affordable public transport that connects us to all local centres and to jobs in Birmingham, Wolverhampton, the airport and the wider West Midlands.

SLP relevance: deliver a co-ordinated and strategic travel and transport network through Sandwell that links communities to opportunities both within and beyond its boundaries supported by appropriate planning policies and land use designations.



Ambition 7: We now have many new homes to meet a full range of housing needs in attractive neighbourhoods and close to key transport routes.

SLP relevance: delivering a healthy supply of land for the delivery of zero and low carbon housing across the borough and supporting the creation of additional affordable and sustainable communities.





Ambition 8: Our distinctive towns and neighbourhoods are successful centres of community life, leisure and entertainment where people increasingly choose to bring up their families.

SLP relevance: promoting and supporting sustainable development that helps to meet local need / demand; provides for sufficient services and facilities in locations accessible to all in Sandwell's communities.



Ambition 9: Sandwell has become a location of choice for industries of the future where the local economy and high performing companies continue to grow.

SLP relevance: delivering a healthy supply of land for economic growth and employment; supporting the delivery of sufficient high quality physical / digital infrastructure; deliver a co-ordinated and strategic travel and transport network through Sandwell; provides land and sites for sufficient educational services and facilities in locations accessible to all.



Ambition 10: Sandwell now has a national reputation for getting things done, where all local partners are focused on what really matters in people's lives and communities.

SLP relevance: up-to-date local plan backed by sound evidence and robust policies that enable planning permissions to be granted swiftly and in close co-operation with applicants, developers and local communities.



1.14. Vision for the SLP

The corporate Vision above sets out the overarching intention of Sandwell Council to deliver safe, healthy and sustainable growth and support communities across the borough. In terms of its land use aspirations, the SLP could also develop its own vision to help meet these ambitions and objectives, and some **suggested** wording is set out below:

In 2041, Sandwell is a thriving, growing and active Borough, leading the urban renaissance of the West Midlands conurbation.

Sandwell is at the forefront of tackling climate change, in its role as a hub for climate adaptation and mitigation technologies and industries. Its new buildings are clean and energy-efficient in their design, materials and operations, its old buildings are adapted to deliver low and zero carbon outputs. It sets the standard in both public and private sectors for embedding climate change awareness and sensitivity in all its actions, outcomes and decisions.

Notwithstanding its urban character, Sandwell's residents enjoy access to country and town parks, open spaces, green networks and corridors and increasing numbers of pocket parks, landscaping schemes and tree cover, as part of their everyday activities and leisure time. Sandwell's natural environment is valued for its own sake as well as for its contribution to the health and wellbeing of people living, working, learning in and enjoying the borough.

Sandwell continues to deliver sustained and sustainable economic growth and investment opportunities from its highly accessible location at the heart of the country. It provides high-quality goods and services from its powerful industrial base and levels of employment, wages and economic activity are high and rising.

Sandwell's residents enjoy longer and healthier lives than in previous decades, thanks to the increase in open spaces, the provision of services and facilities designed to promote active recreation and leisure, the improvement of and increased accessibility to healthcare infrastructure and the promotion of healthy lifestyle choices. They have access to well-performing schools, higher and further education provision at all levels and to continued opportunities for skills development and training.

There is a wide range of housing available to Sandwell residents, designed to support sustainable living and capable of adaptation to suit all sections of the community. Affordable, social and council houses are available to those who need them. New developments are located within attractively landscaped areas, with access to district and low-cost energy and heating projects, sustainable drainage designed to improve the local environment as well as provide reliable protection against flooding and run-off and all necessary services and facilities within walking distance or a short bus ride away.

Sandwell's town centres thrive by day and by night, with an expanded range of retail, leisure and socialising opportunities as well as acting as the foci for new residential developments, community activities and social enterprises.

1.15. Objectives

The following set of objectives has been drafted for the new Local Plan for public consultation. These are intended to help the achievement of the proposed vision for Sandwell and the delivery of sustainable growth. The objectives will form the framework for the SLP, and the policies and proposals of the Local Plan should all contribute to achieving them in a balanced way. This consultation seeks views on these suggested objectives at this stage – they are not fixed / agreed but are intended at this stage to prompt discussion and can be changed.

Objective 1 - Ensure new development takes a proactive approach to climate change mitigation, adaptation and carbon reduction, and that development is resilient to climate change

Objective 2 - Deliver sustainable development in locations where people can access jobs and services, delivering wider positive social and economic outcomes and protecting and enhancing local built and natural environments

Objective 3 - Address Sandwell's identified and wide-ranging housing needs by supporting the provision of high-quality new homes that are capable of being adapted to meet the future needs of occupiers, provide sufficient internal and external space and promote and support climate change adaptation and mitigation through good design and in the materials and techniques used for their construction.

Objective 4 - Support regeneration, business investment and job creation to maintain and grow a prosperous and resilient local and regional economy in ways that consider environmental and climate change factors

Objective 5 - Support Sandwell's towns and local centres as places for economic, residential and cultural activity with good access to services in ways that protect their heritage, character and identity

Objective 6 - Ensure communities in Sandwell are safe and resilient and social cohesion is promoted and enhanced

Objective 7 - Require new development to deliver a high standard of design reflecting local character and distinctiveness and that creates greener and safer places that people feel proud to live and work in.

Objective 8 - Ensure new development and open spaces support health and wellbeing for all, reduce health inequalities and encourage active and healthy lifestyles

Objective 9 - Protect and improve Sandwell's environment, including its natural landscapes, green infrastructure and biodiversity, as well as its rich historic built environment

Objective 10 - Encourage the effective and prudent use of previously developed land and natural resources, including the efficient use of land and buildings and the use of sustainable and climate-aware construction techniques within new developments, as well as providing for waste management and disposal

Objective 11 - Ensure development is supported by essential infrastructure and services and promotes safe movement and more sustainable modes of travel through promoting greener travel networks for walking, cycling and public transport

1) Questions – Vision and Objectives

What do you think are the main issues that the new SLP should address in Sandwell?

Please indicate which option you think should be used as the basis for preparing the SLP Vision:

Option A: The Sandwell Vision 2030 should be used as the basis of preparing the Local Plan, bearing in mind that it will be for the Local Plan to establish a sustainable strategy for the scale and location for future growth and development.

Option B: Create a new vision specifically for the Local Plan and the plan period it will cover along the lines of the suggested wording included above.

If you think the SLP should include a new Vision, (along the lines of the suggested wording above) do you think the Vision should cover any other issues?

Once you have had a look at the issues raised in this document, please let us know your thoughts on the following overall matters:

Are the topic areas and issues being covered the rights ones for Sandwell?

Is there anything else we should be covering?

Do you have any thoughts on the evidence base needed to support the Local Plan Review?

Should the Sandwell Local Plan:

promote higher levels of development to support economic growth; or

plan for the minimum necessary to help meet the needs of our population?

Do you think the SLP should be valid until 2041 or should it run for longer?

If you think the Plan should run for longer, what would be your reason for this?

What are your thoughts on the draft objectives?

Do you think they are appropriate?

Are there any other objectives we should be including?

Do you disagree with them - if so, can you explain which ones and why?

The intention is to include certain draft policies from the Black Country Plan in the SLP, as described in the section headed “Sub-regional Context” above. This will enable us to take advantage of detailed evidence and policy work that has already been carried out, and to allow for some topics (e.g. air quality, climate change, the environment) to be addressed similarly to the other Black Country councils, who will also be reusing some of the BCP policies themselves.

2) Questions – Strategic Policies

Do you agree with the Council’s decision to incorporate some of the former BCP policies⁵ into the SLP, to benefit from the work already done on them and to make it potentially easier for the four Black Country councils to address certain wider-than-local matters in a joined-up manner?

If so: -

Are there any of the BCP policies listed in the appendix that you think the Council should definitely include?

Are there any of the BCP policies in the appendix that you think the Council does not need to include?



⁵Summarised in Appendix A to this document

2. TACKLING CLIMATE CHANGE

The issue of climate change is at the forefront of international, national and local environmental, ecological and political thinking. 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 1.5C 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. The emerging SLP will contain a suite of new 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 Strategy⁶.

One of the main ways of combatting climate change is through promoting decarbonisation. Decarbonisation is the term used to describe the reduction of carbon dioxide emissions by utilising low and renewable sources (solar, wind etc.), thereby achieving a lower output of greenhouse gases into the atmosphere. The aim of decarbonising is to achieve something called 'Net Zero'. Net zero means that any carbon emissions created are balanced by taking the same amount out of the atmosphere. We will reach net zero when the amount of carbon emissions we add is no more than the amount taken away. This in turn helps to control global warming by ensuring that no extra carbon is released overall.

Net Zero will tolerate some emissions however, providing they are balanced out elsewhere. This allows for some industries to continue to operate where it would be difficult for them to reach zero emissions, such as aviation, with their emissions being offset by other sectors where it is easier to reduce emissions or find alternatives for energy consumption. In addition, carbon offset can be helped by industrial or natural processes that consume carbon, such as planting trees for example.

The Government's ambitious *Net Zero Strategy: Building Back Greener* (October 2021) proposes a decarbonised economy by 2050 and identifies various approaches and policies to achieve this

"... this strategy sets out our plans for reducing emissions from each sector of our economy, while hoovering up any remaining emissions with greenhouse gas removals – either natural, like trees, or technological, using carbon capture."

Building Back Greener Executive Summary (October 2021)⁷

The government's intentions for industry set out in the document include decarbonising it in line with net zero goals whilst simultaneously transforming industrial heartlands by attracting inward investment, future-proofing businesses, and securing high-wage, high-skill jobs. To achieve this will involve supporting industry to switch to cleaner fuels; helping it improve resource and energy efficiency; and through fair carbon pricing to drive the deep decarbonisation of industry.

Sandwell, with its wealth of experience in developing manufacturing and engineering solutions, is well-placed to deliver green and carbon reduction-supporting technologies that will help to meet these requirements and targets, which in turn will help revitalise local markets and employment activity.

Decarbonising the economy by deploying renewable energy and strengthening the grid, together with measures to protect communities and infrastructure from flood risk, also have the potential to impact on the landscape. Continued urban development, new or upgraded transport infrastructure, plans for woodland expansion and potential changes in the way open land is managed will all contribute.

Understanding what makes landscapes resilient is becoming increasingly important. Droughts, rising temperatures, floods and the spread of pests and diseases are already evident, affecting landscapes and species across the country.

⁶https://www.sandwell.gov.uk/download/downloads/id/31151/climate_change_strategy.pdf

⁷https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf

The SLP can help to achieve this by making sure its policies and proposals reflect local ambitions and opportunities for growth while delivering the level of carbon and energy savings the government is seeking. To facilitate this, Sandwell Council needs to hear from companies, businesses, educational providers and local people on how they see the future economy and their surroundings developing to fulfil this new role.

Some of the possible issues to be considered are set out below – this list is not meant to be complete and other issues relating to climate change, carbon capture and adaptation can be included where they could be delivered through a land use policy in the SLP.

These policies will not replace nor repeat anything in national planning guidance or legislation. The purpose is to identify if necessary those issues that are of more significance in Sandwell and to provide further guidance through local policies as required.

The Draft Black Country Plan contained several policies relating to climate change and carbon - climate change and carbon reduction in carbon and we intend to adapt and reuse those policies of relevance to Sandwell. The policies cover the following areas:

- Increasing efficiency and resilience
- Energy Infrastructure
- Managing Heat Risk
- Air Quality
- Flood Risk
- Sustainable drainage and surface water management (SuDS)
- Renewable and Low Carbon Energy and BREEAM Standards

Other policies in the BCP also address issues around greener transport infrastructure, such as electric charging points, improved access to public transport and the need to support and promote active travel initiatives, and these areas will also be reflected and addressed in the Sandwell local plan as necessary.



3) Questions – Climate Change

How should we address the climate crisis in the Local Plan Review – what should be our priority or priorities? The following are examples only and you are invited to identify as many other ways as you feel are necessary:

- Reducing the need to travel through promoting accessibility or traveling by more sustainable modes of transport than the car
- Promoting alternative and low-carbon means of travel
- Protecting open space
- Planting more trees
- Promoting climate change-focussed ways of building homes and businesses
- Requiring development to be carbon-neutral or low carbon
- Any other priorities

How else can new development reduce greenhouse gas emissions and respond to the climate crisis?

Should the new plan leave the issue of carbon reduction in new buildings to other relevant legislation rather than making its own provision – i.e., should the plan not include policies on carbon reduction but instead wait for emerging Building Regulations legislation to become law?

How would you feel about building extensions and alterations to your property that were more climate-change adapted and low carbon? For example;

- choosing a design that maintained a more constant indoor temperature during extremes of both heat and cold;
- using a heat pump instead of a normal central heating boiler;

- only using certain building materials developed to be that lower in carbon; or
- planting trees and other vegetation to shade parts of your property that would otherwise get too hot?

What potential sources of renewable energy should the Council be looking at supporting in its local plan policies – examples include, but are not limited to, the following: -

- heat pumps (ground, air, water)
- battery farms
- energy from waste
- solar photovoltaic panels / solar water heating
- energy from wind / water
- biomass crops
- other renewable sources

Heat networks (sometimes referred to as district heating) supply heat from a central source to consumers, via a network of pipes (usually underground) carrying hot water or steam. They can cover a large area or be more locally, supplying a development site or small cluster of buildings. Importantly, a heat network removes the need for individual boilers or electric heaters in every building. Ideally, the heat they use should be derived from a low carbon source - this could be from factories / industrial processes, biomass, heat from waste facilities, the ground, renewable sources such as solar or even from rivers.

As part of its own response to reducing carbon and cutting heating bills for residents, Sandwell Council is currently looking at detailed project development work for a potential heat network, located in West Bromwich with a possible extension to the Cape Hill area of Smethwick.

4) Questions – Heat Networks

Do you agree that Sandwell Council should support the development and delivery of heat networks as part of its own building proposals, to help deliver Net Zero?

Do you think the Council should require private sector and other developers to make provision for heat networks, particularly on larger sites?

Some landscapes tend to be more able to retain their key characteristics and qualities than others – they are more resilient to pressure and alteration from external sources. Such **resilient landscapes** can absorb a certain amount of change without losing what makes them distinctive and special. Less resilient landscapes can suffer disproportionately when changes do occur, sometimes setting off a cycle of decline and ultimately causing a loss of character.

Landscapes that are resilient often include areas where the natural layout or topography of the landscape helps make it visible (so people value it), where habitats are managed sympathetically, where there is variety in terms of tree species, cropping patterns, field boundaries and wider landscape features, and where land uses and activities work with nature, not against it.

Understanding a landscape's resilience can help manage the changes impacting upon it. It can also help maintain the character and diversity that are important to national and local identities and a sense of place.

5) Questions – Resilient Landscapes

How should we ensure new development is able to withstand climate change and provide a comfortable living and working environment for people?

What should be our priorities when considering new design and landscaping to help us cope with climate change?

Apart from not building on or near them, how should we protect the open spaces, parks, countryside and ecology of Sandwell?

Sustainable drainage systems (SuDS) are a natural approach to managing drainage in and around properties and other developments. They work by slowing and holding back the excess surface water that runs off from a site and allowing natural processes to break down pollutants. SuDs include

- green roofs;
- permeable surfaces for footpaths and roads;
- infiltration trenches, filter drains and filter strips;
- swales (shallow drainage channels); and
- detention basins, purpose-built ponds and wetlands.

Given the highly built-up nature of Sandwell, and its topography, flooding is evident in several areas following heavy rain. The new local plan needs to address in more detail suitable means of controlling run-off. One option to deal with this would be to include a policy in the SLP on SuDS, which sets proposed run-off rates for development that achieve at a minimum a reduction equivalent to the current climate change ratio. The policy could also require land to be set aside on development sites to manage flooding and drainage, planted up to assist in absorbing excess water.

6) Questions – Sustainable Drainage

How should the Local Plan Review best manage flood risk whilst still achieving the growth that is needed to make Sandwell successful?

Do you think the SLP needs a policy to identify an acceptable rate of run-off for new developments, or is this covered in sufficient detail in the Black Country Local Standards for SuDS (BCP evidence base⁸)?

Do you think the SLP : -

should include details of the type of SuDS that the Council would prefer to see delivered;

should require SuDS schemes but leave details to developers to propose;

should not require SuDS but allow for alternative drainage schemes to be implemented?

⁸Strategic Flood Risk Assessment, section 9

DEVELOPMENT STRATEGY AND HOUSING PROVISION

Sandwell is a place of contrasts – a highly urbanised landscape with a rich history of heavy industry containing significant areas of open space, parks and canals, historic buildings and places and a growing number of young and ambitious communities. The aim of the SLP is to provide sufficient land and infrastructure to support the continued growth and regeneration of the borough's economy while at the same time protecting its valuable and sensitive open spaces, natural and historic landscapes and distinctive communities.

The borough is multi-centric, with seven main town centres and several smaller local centres serving the population. The development strategy will need to act as a framework within which each of these centres and their associated communities will sit, allowing development to spread around Sandwell into the locations best suited for it.

The SLP will have to deal with allocating **housing** sites across the borough and identifying sufficient housing sites to provide new houses to help meet current and future demand. It will also need to address how sites that come forward during the lifetime of the plan can be dealt with, in particular where they result from the loss of employment land.

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 across the Black Country to meet identified needs. Sandwell itself has a housing need of approximately 30,300 new dwellings between 2021 and 2041 that will not all be delivered by the allocations that will be included in the plan, with an overall supply figure of around 9,492⁹. There will be several options for dealing with this, but the main issue remains the lack of available land suitable for housing.

We have a finite supply of land readily available for development and it may be that we cannot meet all our housing need within Sandwell itself. We can ask adjacent councils if they can let us effectively count some of their available housing towards our need in Sandwell, but many other local councils are in a similar position to us in not having sufficient land to meet their own development needs.

Another possible option is to increase the numbers of houses proposed for new housing sites – we can require developer to build to a higher density in areas where the local infrastructure will support this. For example, housing sites in town centres or close to good public transport links can usually accommodate higher housing numbers than in the suburbs or less-developed areas. The draft BCP suggested densities of

- 100+ dwellings per hectare on sites in strategic or main town centres;
- 45+ dwellings per hectare where sites were highly accessible (e.g. within a ten-minute walk to a GP surgery, local shops etc.); and
- 40+ dwellings per hectare for other locations.

Integrating land use and transport policies is integral in affecting the way people travel from their homes to places of work, education and to access goods and services. Mixed land uses, high density housing, giving priority to pedestrian and cycle paths as the main network for internal neighbourhood traffic, giving priority to public transport as the most important element of a sustainable personal transport system can reduce travel distances and enable active modes and other sustainable modes of transport to access goods and services, reducing private vehicle use, congestion and associated vehicle emissions.

⁹The need figure will change depending on the affordability ratio and the supply is as at 2021.

7) Questions – Future Development in Sandwell

What do you think are the main challenges we face in planning for housing and employment in Sandwell between now and 2041?

What are your views on the overall amount of new housing and employment that is needed in Sandwell?

What types of homes are needed in Sandwell?

Examples may include, but not be limited to:

- Detached or semi-detached family housing
- Bungalows
- Smaller houses such as maisonettes or terraced housing
- Higher density development such as flats and town houses
- Co-housing¹⁰
- Self- and custom-build homes

Where do you think this new housing should be built?

On brownfield or underused land

On previously undeveloped or greenfield sites

On underused or derelict open space

On the sites of older or derelict / vacant buildings, including areas of older housing, flats, factories or other unused buildings?

What sort of new development (homes, workplaces, shops, leisure facilities etc) do you think would help make Sandwell a better place to live by 2041?

¹⁰Cohousing communities are intentional communities, created and run by their residents. Each household has a self-contained, private home as well as shared community space. Residents come together to manage their community, share activities, and often eat together.

Where do you think it should be built?

Do you think there are any sorts of development that would make Sandwell a worse place to live by 2041?

What harm do you think that sort of development might do to Sandwell?

Do you think we should be asking for higher density developments in centres and on sites near public transport hubs / links?

- If so, do you think we should use the densities identified in the draft BCP (Policy HOU2) and set out above?
- Should we ask for higher densities than this?
- Should we ask for lower densities than this?

What do you think a sustainable urban land use and an unsustainable urban land use would be, from a transport point of view?

Tell us about some modern developments or buildings that you know and like. Why do you like them?

Tell us about some modern developments or buildings that you know and don't like. Why don't you like them? How might they have been done better?

Which of the following issues are most important to you (they are not listed in any order)?

Please identify your priorities in order if you can, as this will help us address what is most important to Sandwell's residents and occupiers.

Building affordable housing.

Increasing the number of well-paid jobs in the area.

Creating new green spaces and nature networks

Protecting and improving existing green spaces and wildlife habitats.

Attracting investment and new businesses to the area.

Reducing greenhouse gas emissions and tackling the climate crisis.

Making it easier to travel by bus, tram, train, walking and cycling.

Providing houses of a good size, with gardens and associated open spaces.

Developing a well-designed and attractive built environment, with new buildings and areas that make a positive contribution to their surroundings.

Maintaining a safe and welcoming environment that minimises the likelihood of crime / antisocial behaviour taking place.

Promoting pleasant, clean and lively town centres that people want to visit and use.

Should there be a greater emphasis on: -

- allocating land for mixed-use development (where housing, employment / business development, community facilities etc. sit next to each other);
- allocating land for single end uses, such as just housing or just employment?

Do you have any other comments to make about what development options for housing, employment or other land uses you think we should consider as we draft the Sandwell Local Plan?

Additional small housing sites will become available after the Plan has been adopted and provision to deal with them will need to be made in the new plan. These developments, known as **housing windfall** sites, are expected to provide approximately 1920 homes across Sandwell between 2021 and 2041 and as a result the SLP will have a role in both allocating those sites that are known about when the SLP is being prepared and in dealing with similar sites that are not currently allocated but come forward subsequently.

Where sites are identified during the lifetime of the SLP, they will be dealt with like other planning applications, with reference to the appropriate strategic and local policies on sustainability, design, location, infrastructure and environment. In Sandwell, windfall sites are likely to arise where sites currently in employment use are vacated. In some cases, these sites will be retained for employment uses as they will be of strategic importance to the local economy. In other cases, the council will need to decide whether sites should remain in employment use or be redeveloped for housing or other uses.

8) Questions – Housing Windfall Sites

We think that a local windfall policy is needed to ensure that any proposals for residential development on sites that are not allocated are in the right place and do not have adverse impacts on current and neighbouring uses.

- **Do you agree?**
- **If so, what should it contain?**

Are there any specific local considerations that we should include when we are making decisions on windfall sites?

For example:

- **should development be allowed on current employment land?**

Sandwell is a highly **sustainable location** in many ways, given its history of industry and employment existing alongside residential areas and its good transport and road links. The SLP will seek to maintain those close relationships and networks by encouraging development to make the most of its surroundings and communities, and to provide sufficient opportunities for new and improved infrastructure such as schools, health and emergency services, open spaces and transport hubs.

9) Questions – Sustainable Locations

Should most new development:

- **be concentrated in locations with the best levels of sustainable access to jobs, transport, services and facilities?**
- **be spread out between different towns and centres, to help support new growth and investment in those locations currently without a good supply of jobs, transport, services and facilities?**

Are there any locations in Sandwell you think we should look at in particular to find land for new development?

What else can the SLP do to support the sustainability of local communities?

How can the SLP help to increase the number of journeys made on foot, bicycle and public transport by people who want to access services and facilities?

Masterplans are generally used to help guide development proposals for large or complex sites by showing how new development can be included in local areas. The Council has supported the production of masterplans for West Bromwich¹¹ and the Smethwick to Birmingham Corridor¹² that will be used to support the ongoing regeneration of the areas, and similar documents can be produced where they would help deliver high quality and comprehensive development.

The main issue for the SLP is whether there is a need for a policy about the production of masterplans and to set out the circumstances under which one would be required.

10) Questions – Masterplanning

What sort of development do you think would benefit from having a masterplan? e.g.

- **housing developments over a certain number of dwellings;**
- **employment development over a certain area of floorspace / size of site;**
- **mixed use development (housing and other uses such as employment on the same site);**
- **regeneration schemes in centres?**

Please identify what sort of schemes you think would benefit or whether you think they should all have masterplans.

Should there be a type / size of proposal that would automatically require a masterplan to be produced?

- **If so, what would that be?**

¹¹https://www.sandwell.gov.uk/downloads/file/32496/west_bromwich_masterplan

¹²[Smethwick to Birmingham Corridor Framework and Grove Lane Masterplan](#)

Sandwell Council is committed to delivering new development, places and environments that reflect the principles of **good design**. The National Planning Policy Framework states that, *'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve'*. Creating well-designed places and homes that are distinctive, well-connected, safe and attractive and that provide sufficient space for occupiers' differing needs now and into the future is important; it will make people feel proud of the places where they live and work and help communities to thrive.

The National Design Guide is a comprehensive document that sets out the need for and role of good design in the built environment. It identifies and illustrates the Government's priorities for well-designed places and forms part of the NPPF. Where councils do not have their own in-house design guidance, the national guidance should be used.

The National Design Guide¹³ should also be read in conjunction with the National Model Design Code¹⁴, which provides detailed information on the production of design codes, guides and policies to promote successful design. The National Model Design Code states a Design Code is:

A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.

The BCP proposed two policies¹⁵ relating to design, which supported the delivery of well-designed buildings and spaces that provided an attractive and accessible environment. They also considered climate change and required buildings and landscapes to be designed in ways that could help mitigate its impacts.

There are several documents already in use in Sandwell that help planning officers make decisions on applications with design implications. These include the Residential Design Guide (2014)¹⁶, the Community Safety¹⁷ and Cycling¹⁸ supplementary planning guidance documents (both 2004), area action plans for West Bromwich, Smethwick and Tipton and some neighbourhood and local guidance. Much of this work can be used to develop and inform any design guide / code and can also be either incorporated into the new local plan where needed or updated following adoption of the new plan.

Proposed changes to the status of supplementary guidance form part of the current consultation on national planning guidance; it is possible that such documents will be replaced in due course by "supplementary plans", which will themselves be subject to public examinations. Otherwise, we can choose to incorporate aspects of the supplementary guidance into the new local plan at a later stage. In any case, many of these supplementary planning documents are now out of date and / or have been superseded by the delivery of development or by new legislation, while others could usefully be amalgamated as part of a more joined-up approach to topics such as sustainable travel or design.

Any new design code will be subject to public consultation as part of its adoption, and as such authorities will sometimes prepare and consult on them in tandem with the preparation of a local plan.

¹³<https://www.gov.uk/government/publications/national-design-guide>

¹⁴<https://www.gov.uk/government/publications/national-model-design-code>

¹⁵CSP4 - *Achieving well-designed places*; ENV10 - *Design Quality*

¹⁶[Sandwell Residential Design Guide link](#)

¹⁷[Community Safety SPG](#)

¹⁸[Cycling SPG](#)

We intend to adopt and use the Nationally Described Space Standards¹⁹, which deal with internal space within new dwellings and are suitable for application across all tenures. They set out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height. Using these standards ensures that new houses are built with sufficient internal space to allow for comfortable and healthy occupation.

11) Questions – Good Design

Do you think we should:

- provide a local design policy / design guidance specifically for Sandwell; or**
- use the national code and guidance instead?**

Instead of producing a new design code for Sandwell, should we review and update the existing guidance we already have instead?

We intend to reuse elements of the draft BCP design policies to support the local plan. Do you agree with this approach?

Do you agree with our intention to adopt the Nationally Described Space Standards for new houses?

If not, can you explain why?



¹⁹<https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

Do you think we should:

- Incorporate current supplementary planning guidance into the draft Local Plan (with review and updates as necessary);
- Consider including some aspects of supplementary guidance in the SLP that can be used to shape policies and proposals;
- Retain supplementary planning guidance as separate documents under the SLP and undertake a programme of reviews and updates to them (accepting that this will also require separate examinations) at a later stage; or
- Use another approach?

Planning permission is required for any alteration that materially affects the external appearance or **design of shopfronts**, including canopies /awnings and some security measures. Many proposed shop signs will also require Advertisement Consent.

All new external **security shutters on shopfronts** need planning permission. However, use of toughened glass and internal grills would not normally require planning permission unless the building is 'listed' in which case 'Listed Building Consent' may be required.

The current SAD contains policies on both these matters, and it will be important for the SLP to offer continued guidance on aspects of town centre design to help ensure our shopping centres become and remain attractive and welcoming places to visit. It is intended to retain and update both policies in the SLP.

12) Questions – Shopfront Design

Do you agree with this approach?



4. OTHER HOUSING ISSUES

There is not much evidence of an interest in **self and custom-build housing** in Sandwell and it may be that we do not need a specific policy relating to the matter. However, this may change, and we may wish to produce further guidance on the matter in the future. Legislation requires us to keep a register of enquiries for self-build and interested parties can visit the Council's website to register their interest²⁰.

The provision of plots for self and custom-build housing projects can sometimes entail developers setting aside parcels for private individuals to purchase and develop alongside their own schemes. This can be achieved by including a policy in the local plan that requires developers to provide a percentage of plots for self-build on sites over a certain size – for example, requiring that 5% of plots on sites of over 100 dwellings be identified for self-build. The developers will provide access and services to the edge of the plots and the new plot owners will then take on the task of developing their houses.

13) Questions – Self- and Custom-Build Housing

Do you think Sandwell's new local plan should include a policy on self- and custom-build?

If you do, how do you think the Council should deal with issues around self-build proposals on commercial housing sites?

A design policy requiring self-build homes to reflect the design elements of the site on which they are located (e.g. height, scale, mass, materials, type and design of features such as doors, windows, etc.?)

Requiring developers to allocate sections of commercial housing sites where people undertaking self-build can have a freer hand in the design of their house?

Do you think self-build should be supported in another way in Sandwell (e.g. not provided on commercial housing development sites; subject to a different policy approach)?

²⁰https://www.sandwell.gov.uk/info/200183/land_and_property/4164/self-build_and_custom_housebuilding_act_2015

SAD Policy H4 refers to the needs of people with **specific housing requirements**, including the elderly, the physically less able, people who require supported living opportunities and people with other mental or physical issues.

The Council feels it is important to keep a revised version of the current policy and to understand how it might be used to encourage the delivery of suitable housing without causing issues around viability for developers (e.g. by referring to the standards outlined in the optional Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings).

14) Questions – Specific Housing Requirements

Do you agree that the new SLP should contain a policy on housing suitable to meet the needs of people who have special needs or who require additional support?

What types of housing suitable to meet special needs do you think should be encouraged and delivered in Sandwell? E.g.

- bungalows;
- houses capable of easy adaptation for users of assistive technology such as wheelchairs;
- houses that can be easily altered as people age or their medical or physical condition changes;
- other types of dwellings.

The Council intends to incorporate the national minimum space standards for new housing as set out in the optional Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings²¹.

- **Do you agree with this approach?**

²¹This requires houses to be designed and built to meet the requirements of people with differing needs, such as older people or people with a disability, and to be capable of being adapted for use where people's physical abilities change over time.

Gypsies, Travellers and Travelling Showpeople have specific accommodation requirements, including the need for both temporary and permanent sites with on-site services and utilities. Travelling showpeople also need access to large-scale storage provision for their equipment during the winter period when they are not on the road. The draft BCP included a policy intended to provide sufficient, appropriately designed and integrated sites to accommodate the needs of travelling communities over the plan period and it is our intention to revisit and adapt this policy as necessary to cover needs generated in Sandwell.

15) Questions – Gypsies, Travellers and Travelling Showpeople

Do you agree with the proposal to adapt the draft BCP policy on the needs of travelling communities for use in Sandwell?

Over the last few years the issue of the number and location of **Houses in Multiple Occupation**²² (HMOs) in Sandwell has risen in importance. A combination of changes to permitted development rights and the need to provide affordable accommodation for people on low incomes has led to an increase in the number of HMOs and in the numbers of related planning applications being determined by Planning Committee.

HMOs provide an additional and valuable source of lower-cost accommodation for sections of the community who cannot afford to purchase their own property or who do not qualify for other forms of social housing. They also provide for the needs of students and people commuting from elsewhere to work in Sandwell.

There is a perception however that HMOs lead to increases in anti-social behaviour, increased activity, parking problems, noise nuisance and more transient occupiers leading to a weakening of community coherence. As a result, applications often result in widespread objections from the public. However, in many cases there are no planning grounds for officers to recommend refusal, resulting in members either going against officer recommendations to refuse proposals (which in turn can lead to appeals against the decisions) or being left feeling that they have no powers to control the proposed use.

There is currently no reference to, or policy on, HMOs in either the Black Country Core Strategy or the SAD. Some national planning guidance is available, covering licensing and mandatory room sizes²³.

Having a policy on HMOs in the SLP will allow Sandwell to produce further supplementary planning guidance on them. This will set out what people need to consider when developing HMOs, thereby supporting both the council and landlords and hopefully reducing the likelihood of further planning appeals.

Other local authorities have addressed the issues around HMOs through adopting planning policies that include certain criteria against which proposals are assessed; typical examples of these include the following (from Brighton and Hove City Council's City Plan, part two of which was adopted in October 2022):

- HMO development will not be permitted where more than 10% of dwellings within a radius of 50 metres of the application site are already in HMO use; ...

²²<https://www.gov.uk/private-renting/houses-in-multiple-occupation>

²³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/925269/HMOs_and_residential_property_licensing_reforms_guidance.pdf

[new HMOs are only permitted where]:

- fewer than 20% of dwellings in the wider neighbourhood area are already in use as HMOs;
- the proposal does not result in a non-HMO dwelling being sandwiched between two existing HMOs in a continuous frontage;
- the proposal does not lead to a continuous frontage of three or more HMOs;

as well as requirements relating to internal and external space standards and facilities.

Issues around space standards, parking and other design-related aspects can be dealt with through other policies in the SLP and / or by issuing guidance on them in a supplementary planning document.

16) Questions – Houses in Multiple Occupation

We think that the Sandwell Plan could have a policy on HMOs that seeks to define areas where HMOs would be inappropriate / discouraged, e.g. where there are already a number of existing HMOs.

- **Do you agree and if so what criteria do you think should be used to evidence why they are inappropriate?**
- **If you do not think a policy would be appropriate, can you explain why you think that?**
- **Are there any alternative options we might look to use instead of or alongside a planning policy for HMOs?**

We think that the policy could look to identify aspects of HMO provision that have the potential to adversely affect the amenities of adjoining or neighbouring properties (e.g. noise, overlooking, general disturbance, or impact on visual amenity) and provide criteria to manage those issues;

Do you agree and if so, what sort of realistic criteria should we be looking to include?

We think that the policy could introduce percentage thresholds and clustering criteria to ensure that HMOs are not concentrated in an area above a certain level and to control their numbers across a wider area;

Do you agree and if so what evidence is needed to identify and justify these criteria?

To enable us to further control changes of use to small HMOs, the Council will need to impose an Article 4 direction, which, once adopted, will make such changes of use subject to the planning application process.

Do you agree with this approach?

Do you disagree? If so, can you explain why?

Do you think the Council should:

- introduce a Sandwell-wide Article 4 Direction for HMOs (requires every proposal to develop an HMO to be subject to planning permission and will involve additional time and resources to manage)?
- do you think an Article 4 Direction should be imposed only on those parts of Sandwell where there are already a large number of HMOs and where there is evidence of the sorts of issues mentioned previously?

5. HEALTHY PEOPLE AND COMMUNITIES

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 disabled²⁴.

The Marmot Review of Health Inequalities showed that the largest influences on physical and mental health are the social determinants of health, for example, education, employment, social networks and housing²⁵. These aspects can be positively impacted by planning for the right development in the best locations, which is what the SLP will do.

There are various elements that can contribute to increasing physical activity in a healthy environment such as encouraging change in travel behaviour to active modes of travel, active design, access to green and blue spaces, allotments, safe places, clean air and a positive soundscape. In one study, people with good access to green spaces were 24% more likely to be active²⁶.

17) Questions –Development for Health

What do you think are the key public health issues facing Sandwell?

How should we plan for our ageing population?

Do we need to include specific development allocations such as sites for retirement facilities or assisted living?

Where should such allocations be located?

What should the plan contain that would help you change your travel habits to more active modes of travel (such as cycling and walking)?

²⁴<https://www.sandwelltrends.info/health-general-page/> ²⁵Marmot, M (2010). *Fair Society, Healthy Lives, The Marmot Review*.

²⁶Natural England, *Technical Information Note TIN055, "An estimate of the economic and health value and cost effectiveness of the expanded WHI scheme 2009"*, Natural England, 2009.

Community and social facilities are those aspects of a town or local centre that enable people to make the most of their local area. They provide those services and functions that allow people to interact with each other; they also deliver the facilities that make society run smoothly. Any successful and sustainable location or development will deliver and enhance these functions as part of their offer.

Community and social facilities can include (but not be limited to) the following: -

- a) health and social care facilities (e.g. GP surgeries, NHS walk-in centres, dentists);
- b) leisure and sports facilities;
- c) green infrastructure and heritage assets (e.g. parks, gardens, woodlands, playing fields, allotments, cemeteries);
- d) transport (e.g. footpaths, bridleways, cycleways, highways, public transport, railways, car parks);
- e) community centres / meeting halls;
- f) youth facilities;
- g) play facilities;
- h) library and information services;
- i) cultural facilities;
- j) places of worship;
- k) theatres, public art, heritage centres;
- l) public house;
- m) local shops;
- n) post offices;
- o) schools and other places of learning.

Making sure new development is located where there is access to these services and facilities will ensure that sustainable, vibrant and healthy communities can be created and supported. Where such facilities don't exist or are not sufficient to meet the needs of local communities, the SLP can help to identify what infrastructure might be required to do so.

Increasing the provision of, and accessibility to, sports fields and areas for **active recreation** will have a positive impact on the health and fitness of local communities, as well as supporting community interactions and participation in formal sports. We have recently completed a review of the Playing Pitch and Outdoor Sports Strategy for Sandwell as part of the work undertaken for the BCP and so have a very clear understanding of the demand for, and supply of, facilities for sport.

Sport England's publication 'Active Design'²⁷ provides details, case studies and a framework describing how to incorporate active lifestyles and sport into cities, towns and villages. Sport England states that,

"Active Design wraps together the planning and considerations that should be made when designing the places and spaces we live in. It's about designing and adapting where we live to encourage activity in our everyday lives, making the active choice the easy choice".

18) Questions –Active Recreation

Should we require masterplans and new developments to refer to the Sport England Active Design Principles²⁸?

How best can we support the protection and enhancement of current sporting provision?



²⁷Sport England, "Active Design: Planning for health and wellbeing through sport and physical activity," Sport England, 2015.

²⁸<https://www.sportengland.org/news/active-design-guide>

One issue that has become apparent is the reuse of buildings for **community facilities and services**. In some cases, these new uses can attract large numbers of visitors and might generate significant additional traffic on often congested local roads, especially in residential areas. A possible solution may be to encourage community uses to occupy vacant premises in town centres, where increased activity can more easily be accommodated, not least by walking and cycling routes for short journeys and public transport networks and the availability of more accessible parking where deemed appropriate. Given the increase in vacant retail and other commercial buildings in town centres, this would also help to maintain the vitality and viability of centres by introducing additional visitors and activity.

19) Questions – Community Facilities and Services

Which community facilities and services do you think we need more of in Sandwell as a whole?

Setting aside health-related uses (surgeries, health centres, dentists etc.), schools and shops for a moment, are there any other public facilities and services you would like to see more of in Sandwell?

Is there a shortage of community facilities and services in your area?

- **Which ones are lacking, in your view?**

(If you can give us an idea of what part of Sandwell you are referring to, that would be helpful)

If you think your area needs more community facilities and services, how and where would you want to see these uses provided?

- **We would be especially interested in locations where services can be easily accessed without people having to use a car.**

Where new community facilities are proposed, such as churches, mosques, community centres and other uses generating additional footfall / car journeys, should the SLP require those uses to be sited in town centres in most cases?

- If you disagree with this, can you explain why?



Green infrastructure is about more than just landscaping schemes, although it will also include amenity planting and layouts. Green infrastructure is essentially a network of multi-functional green space and other natural features that have benefits for the quality of life and environment of communities. These assets will support habitats and biodiversity as well as creating shelter, a focus and possibly a way of shaping plots, defining routes and building phases and can include parks, open spaces, playing fields, woodlands, street trees, allotments, private gardens and green roofs and walls.

They will also assist in water absorption and improving air quality. Linked open spaces (overlooked by active frontages) of a variety of sizes, sense of enclosure and function should run through the scheme, to provide pleasant walkways, opportunities for exercise and outdoor public sitting areas. They will also help to create and sustain wildlife corridors. It will include proposals to use green assets such as hedgerows and trees as fully as possible.

Blue infrastructure refers to the planned handling of water and drainage on sites and the incorporation of existing water features such as rivers, canals and ponds into designs. This will usually be closely associated with green infrastructure and can include swales, drainage ditches, balancing ponds and other components of a sustainable drainage scheme, contributing to the absorption and slow release of surface water.

Sandwell has an unparalleled network of leisure waterways that are increasingly valued as corridors of biodiversity, passive or active recreation and sustainable transport. Towns Fund bids have prioritised significant investment in upgrading the infrastructure of canals and raising their profile to encourage usage, especially as canals are supported and loved by many. More could be made of canals and waterways where they adjoin proposed development sites and areas identified for recreational and leisure use. We intend to use the draft BCP policy relating to canals as a basis for further consideration of the role canals and waterways play in the environment of Sandwell, perhaps through the introduction of separate guidance.

20) Questions – Green and Blue Infrastructure

Should the SLP take a more positive approach to ensuring green and blue infrastructure and their benefits are maximised in new development?

- **Should new green / blue infrastructure always be required on sites?**
- **Should it be required even if it would mean losing the opportunity to provide more housing or employment development?**

If so, do you have any suggestions how this might be done?

The NPPF (revised July 2021) requires local authorities to plan positively for the provision and use of shared spaces, including **open space** (paragraph 93). In paragraph 98, it goes on to state,

Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision.

New housing developments will often include an element of open space, but to date no formal policy guidance has been available from Sandwell Council about exactly how much open space should be provided. A broad monitoring target of 4.42ha of accessible open space per 1,000 population has been established, but there is currently no formula for calculating open space provision to meet additional needs generated by new housing, or to maintain or improve existing supply.

As larger and more complex housing sites are brought forward within Sandwell, having a formal requirement for additional open space would allow the Council to maintain and, in some instances, improve the borough's supply of open and informal spaces.

Other authorities have produced policies and related planning guidance on the provision of open space on development sites and this is an issue to be considered in Sandwell. For example, policies elsewhere may state that development proposals should maintain and/or enhance the quantity, quality and accessibility of open space and address any shortfalls in provision, when measured against locally derived standards; or development that increases demand for open space will be required to address this demand in line with the relevant planning policy.

There are questions around the viability of requiring housebuilders to give up land that might otherwise go for housing, and that will need to be considered when the Council decides how to take this issue forward.

There is also a need to consider whether we should be prepared to accept the loss of some current open spaces (for example, those areas that are of poor quality, low accessibility and minimal value to local communities and that would cost a disproportionate amount of money to upgrade), to provide development sites and help meet our housing need. In turn, releasing such sites for alternative development could protect more environmentally sensitive land from development pressure; we could also require the provision of replacement open spaces of a higher quality than previously to compensate as part of any new development. On the other hand, it is often the case that even land in poor condition can have value for local people and wildlife.

It may be that a combination of open space provision can be agreed, such as on-site provision where possible in the first instance, off-site provision or improvements to existing facilities in the immediate vicinity or as a last resort, a commuted financial contribution to be spent elsewhere on open space and recreation improvements.



The draft Black Country Plan included policies on open space and recreational provision and we intend to incorporate amended versions of those policies where they are relevant to Sandwell. They relate to the following areas:

- Open Space and Recreation
- Playing Fields and Sports Facilities

21) Questions – Open Space

How should new developments support the provision of high quality open space

Do you think development proposals, especially big housing schemes, should always include dedicated open space for recreation and leisure on site?

If not, can you explain why?

Do you think a combined approach (provision of open space on-site / new off-site provision / financial contributions for improvements to existing open space nearby) would be more appropriate?

Can you explain why?

What scale of housing site do you think should be required to contribute towards providing open space? For example, should we be asking for new open space on

- sites above ten houses in size
- sites above 20 houses in size
- sites above 40 houses in size?

Would you rather:

see improvements to existing areas of open space in your area, or

see new open spaces be created when development happens nearby?

Can you explain a bit more about why you think this?

What amount of open space should be provided? For example, should new open space be provided covering: -

10%

15%

20%

another percentage (please say how much) of the area of a housing site?

Should the amount of open space instead be calculated based on the number of bedrooms per property being provided?

- For example, developments delivering larger accommodation (properties with three, four or more bedrooms) should provide more open space than those for one or two bedroomed properties.

Should open space requirement be relaxed for types of housing that are less likely to generate high levels of active demand, such as accommodation for older people?

If large areas of open space are required, this might affect how many houses can be built on a site and / or the viability of development on the site – what is your view on that?

Should we: -

consider releasing existing open space sites for development that are demonstrated to be of poor quality and low value and that have no significant environmental benefits?

consider releasing existing open space sites for development that are demonstrated to be of poor quality and low value and that have no significant environmental benefits but only where replacement open space of a higher quality / quantity can be provided nearby?

protect all current open space notwithstanding its condition or accessibility (on the basis that it has value in its own right and could be improved in future)?

What type of open space should be provided? For example, informal open space such as fields for walking, dog walking etc., playgrounds / play areas for children, formal parks, allotments etc.?

Would you like to see more allotments / opportunities for growing food in your community provided as part of housing developments or in the wider area?

Hot food takeaways and gambling establishments are legitimate and licensed / registered aspects of functioning communities and are not inappropriate in suitable places. Planning and planning policies do not assign moral weight to their operation or use, and they provide for the needs of people who patronise them with no related adverse impacts, for the most part.

However, these are also uses that, if over-concentrated in an area or located near other potentially sensitive uses, can cause a harmful effect on vitality and viability, character, function and amenity, and can also have negative impacts on people's health and wellbeing.

The onset of the COVID19 pandemic and its related lockdowns saw the Government relaxing the relevant legislation to allow pubs and restaurants to offer takeaways, to enable them to continue trading at a time when the hospitality sector was under great economic pressure. This relaxation was extended to March 2022 and there has so far been no further advice or guidance from the government on when it might be rescinded.

Betting shops and adult gaming centres can also have negative impacts, particularly where there are high concentrations of these uses in a location. This particularly relates to the impacts on retail areas and the impact upon personal health and wellbeing related to problem gambling.

Planning policies and supplementary planning documents (such as the Council's current SPD on hot food takeaways) can, where justified, seek to limit the proliferation of certain uses where evidence demonstrates this is appropriate (and where such uses require planning permission). This could include having regard to the impact of certain uses in proximity to locations where children and young people congregate such as schools, community centres and playgrounds, and the over-concentration of certain uses within a specified area.

22) Questions – Hot Food Takeaways and Gambling Establishments

Do you think the Council should look more closely at where businesses such as hot food takeaways and gambling establishments are located?

Do you have a view on where they should be allowed in relation to sensitive uses such as schools, etc.?

Do you think that the SLP should try to control / regulate hot food takeaways or not (bearing in mind that there is no legislation that allows councils to refuse planning permission for these uses solely on the basis that people find them undesirable)?

This could be addressed by having a policy that looked at:

- Clustering (only granting permission for a given number / percentage of similar uses within a certain radius, limiting the maximum number of consecutive takeaway food outlets, or capping the proportion of all retail space occupied by this use in an area)
- Location (refusing consent for new proposals within a given distance of a sensitive use e.g. schools, parks, leisure facilities including sport centres and youth clubs)
- The implementation of community infrastructure levies with funds allocated to obesity prevention initiatives;
- Mandatory sign-up to a healthy catering commitment scheme and requirements for submission of health impact assessments alongside planning applications.
- Impacts on the amenity of residential and other sensitive uses e.g. by creating excessive noise, litter, odours, traffic problems

Do you think that the SLP should try to control / regulate betting shops, adult gaming centres, amusement arcades, pawnbrokers, pay day loan shops and shisha bars (bearing in mind that there is no legislation that allows councils to refuse planning permission for these uses solely on the basis that some people find them undesirable)?

This could be addressed by having a policy that looked at:

- Clustering (as for hot food takeaways);
- Location relative to sensitive uses (as for hot food takeaways);
- Providing an active frontage creating a positive visual impact on the street scene;
- Impacts on local community and residential amenity.

6. THRIVING TOWNS

COVID-19 has had a profound effect on Sandwell's established centres, as patterns of shopping have changed radically and perhaps permanently in some cases. However, these changes were not wholly unexpected; the lockdown effectively sped up a transformation that was already happening in relation to the continuing rise in online shopping. 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. On the other hand, some centres in Sandwell, especially those that had been performing well before the pandemic, have recovered more quickly from the related downturn and in some cases have continued to perform more strongly than previously. In addition, smaller centres serving a local population and with a good range of shops and services have done well, as have larger supermarkets and discount stores.

Work was undertaken as part of the BCP evidence base on the current and future ability of the Black Country's main centres to provide and maintain retail capacity²⁹ across the area. In the context of the issues and challenges, and the findings of the capacity forecasts, the four Black Country authorities need to plan for less, not more retail floorspace over the next 5-10 years and beyond. Although retail will remain a key part of their overall offer - helping to generate trips, footfall and spend – there is a need for locally-derived policies and strategies to help promote greater flexibility and diversity, enabling these areas to respond more effectively and rapidly to future trends. This flexibility and diversity will, in turn, help to create more resilient, attractive and successful town centres. It will also help to strengthen their respective roles in the network and hierarchy of centres as places to live, work, shop, study, play and visit.

Councils have traditionally used land use frontage policies to try to shape and manage what types of commercial activity operates in different parts of town centres. For example, primary frontages (such as main / high streets) are the locations for most of the retail units in centres and maintain the sense of vitality of the centre by encouraging footfall. Financial and professional uses (such as banks, building societies, etc., traditionally with a lower reliance on passing trade / footfall for their businesses), restaurants, bars and other non-shop uses can then be directed to adjacent areas, where they will not disrupt the retail offer and will enjoy the benefits of co-location by being in proximity to similar uses and thus to a wider potential market for their services. This approach will need to change given the trends outlined above, so different uses are spread out through a centre rather than being grouped together, in particular where a night-time economy is developing and new opportunities for housing in centres is also explored.

Current SAD policy CEN1 promotes a frontage approach within such centres with a defined core, or which may have a core subsequently defined by an AAP or DPD, the retail function should be protected by restricting the number of non-retail uses. Outside the retail core a wider range of uses and a higher proportion of these will be encouraged. In centres where the core is not defined the policy states that it may be necessary to control non-retail uses to protect the retail function, vitality and viability of the centre.

The Government's changes to planning regulations means that a landowner no longer needs planning permission to change any shop to a restaurant or even to an office. However, control can still be exercised over other types of use / developments in centres, such as payday loan shops, betting shops and hot food takeaways, by using a frontages policy.

The Council will still have a role to play in the evolution of town centres. An attractive town centre that provides a range of unit types will be best placed to make a strong and lasting recovery in the future. The Council can also choose to promote, or discourage, the diversification of an entertainment or evening economy. Planning permission is still needed to make changes to the use or physical appearance of buildings in centres, and the licensing regime will still allow the Council to protect the living conditions of those who live within, or close to, town centres.

²⁹<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4a/>

23) Questions – Retailing in Town Centres

What are the main issues you think our town centres and high streets are facing?

What can the SLP do to help them adapt to changing shopping trends – for example, by managing or promoting certain sorts of development within them?

Do you think more people should be encouraged to live in centres?

How can we identify sites in our town centres for future shopping, leisure and commercial / employment needs?

- Do you know of any suitable sites or premises in your local area that you think could be developed to provide modern town centre uses?

Should Sandwell maintain a policy for controlling the balance of retail and non-retail uses in main town centre core frontages?

SAD Policy DM5 refers to the special consideration that will be given to any proposals that relate to sites at any of the **borough's gateways** – these are generally areas located around the borough boundary at high profile intersections and road junctions. Gateways set the effective standard for new visitors' experiences of coming into Sandwell and the current policy seeks to ensure that the best is made of these prominent locations and sites.

The current policy includes several principles around preserving and enhancing existing buildings and structures, reflecting the topography of the area and making sure new development is of a high design quality and uses good quality materials. It also supports the improvement of the wider area within which the gateway site sits.

24) Questions – Gateway Sites

Do we need to retain a policy referring to gateway sites?

- **If so, do we need to revise or update it in accordance with other potential policy areas of the SLP, such as those dealing with climate change mitigation or opportunities for increasing biodiversity and ecological value?**



Sandwell has a hierarchy of **town and local centres** and benefits from their links with their local communities and beyond. The major centres and towns in Sandwell (excluding West Bromwich) serve their local communities and include: -

- Bearwood;
- Blackheath;
- Cape Hill;
- Cradley Heath;
- Great Bridge;
- Oldbury;
- Wednesbury.

To ensure each centre is given the right opportunities to develop and retain / improve its essential functions, it will be necessary to consider whether some or all of them need specific policies designed to support their roles. In addition, each town centre will need to have an identified boundary within which these specific policies apply.

Some suggestions have been received about potential changes to existing town centre boundaries. These are included below as examples only - we would welcome your thoughts on these and any other changes you may think appropriate:

- Oldbury – should the town centre boundary include the Oldbury Green Retail Park?
- Cradley Heath – should the boundary include the Lidl store on Lower High Street?
- Blackheath – should the boundary be extended across the ring road to include the Lidl store?
- Bearwood – should the boundary be amended to include St Marys Church, church hall and community hub (corner of Bearwood Road / St Mary's Road) and St Gregory's church on Three Shires Oak Road? Should the boundary also extend to include the 24/7 gym, Jet filling station and Majestic Wines on Hagley Road?

Appendix B sets out the current identified town centre boundaries for each of the centres.

25) Questions – Town Centres

Looking at the town centre boundary plans (Appendix B to this document), especially for the centre(s) you know best, do you think their current boundary:

Is about right (all the main areas of the centre are included and there is no need to expand or reduce it)

Is too big (i.e. the centre in reality is more tightly focussed around certain roads or areas and / or the current boundary covers places that aren't really in the town centre)

Should be expanded (the town centre as you know and use it covers a wider area than shown and additional streets or locations could be included)?

Are there any additional centres that you think should be “upgraded” to a similar status as the major centres identified above, because of their degree of activity or size?

If so, which ones and why?

Thinking about the centre(s) you know best (maybe because you live in them or close by, or work in them), what do you think their good points are – for example, they have a safe and pleasant environment, a good range of shops and services, are attractive or contain historic buildings etc.?

- Please indicate which centres you are referring to
- What aspects would you want to see kept and made even more of, if possible?

Thinking about the centre(s) you know best (maybe because you live in them or close by, or work in them), what do you think their bad points are – for example, they have too many empty shops, they are poorly laid out, they are not easy to get to, there isn't suitable car parking etc?

- Please indicate which centres you are referring to
- What would you like to see done to improve them?

Do you think areas of denser residential development (e.g. flats above shops and office building conversions) in town centres should be located close to rail / metro links / public transport opportunities?

- Should the boundary of a town centre be altered to enable such changes to take place?



7. WEST BROMWICH

West Bromwich is the largest centre in Sandwell and fulfils a strategic role within the wider Black Country in delivering opportunities for retailing, business and commercial activity, education, regeneration, housing and as part of a strategic transportation network.

Prior to the start of the local plan review, and to aid regeneration of the centre and stimulate a COVID-19 recovery, a masterplan for West Bromwich centre³⁰ was commissioned alongside the production by the Council of an Interim Planning Statement (IPS)³¹, with a final report endorsed by Cabinet on the 9th February 2022. It is hoped that the masterplan will act as a catalyst for on-going and new regeneration schemes for West Bromwich – unlocking further investment and opportunities to boost the town’s future economic growth. The masterplan builds on the Towns Investment Plan for West Bromwich, which was drawn up by the council in response to the Government’s Towns Fund programme.

The IPS will form the basis for future policies for West Bromwich and has been subject to public consultation during its preparation.

The priorities for West Bromwich are to reinvigorate the town centre; unlock land to aid regeneration; support good quality jobs and stimulate Covid-19 recovery by: -

- Repurposing vacant premises and sites in the strategic centre to provide community, education, healthcare provision, with additional residential use being a major contributor in attracting investment and promoting vitality of the centre.
- Seeking office development in sustainable locations within the centre.
- Transforming the town centre further through site assembly and development paving the way for new markets, education facilities and high-quality housing.

Key issues for West Bromwich include: -

- The loss of comparison retail shopping (i.e. clothes, shoes, electrical goods etc) to the internet.
- Increased levels of convenience (food) shopping now being undertaken online.
- The rise of limited-range food discounters (e.g. Aldi, Lidl).
- A greater than forecast demand for employment land, which has had an impact on the provision of vacant / brownfield land for housing in the borough. This is compounded by viability issues. In Sandwell there is now a substantial shortfall in the supply of new dwellings.
- In relation to the above, rather than the forecast surplus of employment land freeing up brownfield land for housing, there is now a deficit of employment land available for economic development and growth purposes.
- Permitted development rights have changed significantly in recent years; this has seen considerable numbers of new dwellings being created from the conversion of existing offices in the centre. This is likely to continue.
- Technological changes driven by people working from home has led to reduced demand for offices in centres, with levels of future demand now uncertain.

³⁰https://www.sandwell.gov.uk/downloads/file/32496/west_bromwich_masterplan

³¹https://www.sandwell.gov.uk/downloads/download/2798/west_bromwich_interim_planning_statement

- 'Knock-on' effects of reduced office occupancy on aspects of the service economy formerly dependent on high footfall in centres like West Bromwich.

These trends were accelerated by COVID-19 pandemic-related opening restrictions on non-essential retail and services.

26) Questions – West Bromwich

Thinking about West Bromwich Town Centre, do you think the issues listed above are the right ones for the Council to consider in the SLP?

Are there any additional issues in West Bromwich you think should be included for consideration?

Of the issues for West Bromwich listed above, which ones do you think the SLP should deal with first or more urgently? Please identify a “top three” if you can.

Why do you think the issues you have identified are the most urgent ones?



As it is now clear that the levels of retail expenditure growth forecast previously in West Bromwich have not come forward, there is an excess of retail floorspace in the centre that will require repurposing. This has been reflected in the Masterplan in particular, but we are keen to understand whether you have any other thoughts on suitable uses.

27) Questions – West Bromwich Future Uses

What would you like to see vacant shops used for in West Bromwich? Please let us know what your preferred uses are in order, if you can.

Retail (retain as shop units)

Houses / residential accommodation

Other employment uses e.g. offices, businesses, live / work etc.

Public facilities / services e.g. educational uses, healthcare facilities, community hubs / meeting places etc.

Leisure uses e.g. gyms, fitness and wellbeing studios, amusement arcades etc.

Cafes / restaurants / entertainment venues

Other uses (please let us know what these uses are, in your view)

What other sorts of development or activity do you think West Bromwich lacks?

If you don't visit West Bromwich often, or as often as you might previously have done, what would encourage / attract you to start going there again?

8. SUPPORTING A SUSTAINABLE ECONOMY

Building a strong, responsive and competitive economy is one of the three overarching objectives of the NPPF. This should be achieved by ensuring that sufficient land of the right type is available in the right place at the right time to support growth, innovation and improved productivity and by identifying and co-ordinating the provision of infrastructure.

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 those 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)³².

The Plan will need to set out the amount of employment land that is required over the period up to 2041. The evidence base for the employment land policies consists of a two stage Economic Needs Assessment (EDNA) and the Black Country Employment Area Review (BEAR). The EDNA provides an objective assessment of the industrial land needs for the Black Country, based upon an independent assessment of the area's economic development needs.

The EDNA identifies a need for 205.4 hectares of employment land over the Plan period, and that Sandwell has a supply of 69.9 hectares, resulting in a shortfall of 135.5 hectares to 2040³³.

Key conclusions of the EDNA included: -

- a) The Black Country was hit hard by COVID-19 but is expected to recover strongly and has the capacity to deliver significant growth.
- b) Even pre-COVID, recent growth was achieved against a backdrop of a weak local skills base, low business start-up rates and low GVA per head in comparison with the West Midlands and UK averages.
- c) Economic development strategies including the Strategic Economic Plan (SEP) and Local Industrial Strategy seek to address these challenges to accelerate growth of the local economy.
- d) The Black Country employment land supply in 2020 was largely inherited from the Core Strategy and the existing SAD. The land supply is dominated by small sites.
- e) Going forward, attracting high growth knowledge-based industries in line with the SEP ambitions will require the provision of more prestigious sites and high-quality spaces with good connectivity and easy access to key transport hubs.
- f) The Black Country should look to accommodate a variety of business needs, including start-ups and smaller businesses. This means a mixed portfolio of sites will need to be made available, including large and small sites and spaces.
- g) It is imperative to protect the existing supply of land to meet future needs that will arise from a high growth driven economy.

³²Source – Business Growth Team, Sandwell MBC

³³The EDNA will be subject to a further review in 2023 and as a result employment land needs / delivery timescales may change.

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 and is therefore a key challenge. To address the above issues, employment policies should address the following: -

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

The Black Country Economic Development Needs Assessment (EDNA) has identified a short fall between **employment land need** and supply up to 2040. This shortfall is based on the demand requirement taking into account potential losses of land and opportunities for windfall development associated with the development of vacant and underused land within existing employment areas.

Sandwell's '*Top 50 Fastest Growing Companies Index 2020*' report lists the 50 highest-growth companies in Sandwell, with all 50 of these companies having grown by more than 10% and the top 22 having grown by 20% - and having generated £2.2 billion in revenue. Ensuring companies such as these have premises to expand in within the Sandwell is critical to the area's economy – 44% are within the manufacturing sector and therefore rely upon employment land.

28) Questions – Employment Land Need

How do you think the shortfall in the supply of employment land should be addressed?

As stated in the 2022 EDNA the diversity of the economic sectors in the area and sectors of local strongholds of employment stability and strength e.g. manufacturing and wholesale/distribution as well as retail and health, need to be spatially accommodated in a way (and on sites) that both meets these sectors' current and future needs and ensures their sustained growth. New employment sectors are also emerging and their demand for employment land will also need to be met.

29) Questions – Sandwell's Economy

Do you think that a local Economic Development Strategy policy is still required for Sandwell?

- **If you do, what do you think it should cover?**

Are there any sorts of new / emerging industries that we should be trying to attract into Sandwell?



The primary focus for co-ordinated and sustained **regeneration** in Sandwell is in the Central Core Growth Area, which includes the key employment areas of the Borough. It will be the focus for the delivery of regeneration and renewal opportunities for employment.

The need for regeneration in Sandwell is at the heart of much of what the Council does, and it has delivered some innovative and important schemes already. The ongoing commitment to regeneration will continue across the Council as a whole, but the Issues and Options process gives us an opportunity to think about how else we might contribute to making Sandwell a better place to live, work and spend time.

Regeneration will include delivering new development / redevelopment in both industrial and residential areas. As part of these proposals, the Council will be looking at associated opportunities for delivering climate change mitigation and improving the physical environments that people occupy and use.

30) Questions – Regeneration

Do you think that the SLP needs a specific policy in relation to the regeneration of parts of Sandwell?

- **If so, what should the policy contain?**
- **Do you know of any areas in particular that should be included?**

Thinking about areas that need to be improved, what do you think would make Sandwell a more attractive prospect for potential homeowners, inward investment and new business occupiers?

Improved infrastructure (e.g. roads, drainage, accessibility to public transport)?

Areas of mixed use (i.e. where housing and employment uses are situated next to or near each other, for example in town centres or industrial areas)?

The inclusion of more open space and landscaping (e.g. pocket parks, tree planting, open space and informal sitting areas)?

Anything else?

Part of the borough's legacy of heavy industry is the **sub-division of large industrial sites and premises** that have been occupied / reused by several smaller firms, creating clusters of smaller businesses. This can mean that potential new occupiers with a need for large buildings are unable to set up in Sandwell because these big legacy sites are unavailable for single occupiers. We need to consider whether we should be supporting the change to smaller businesses across the borough or whether we should be identifying opportunities to maintain a stock of larger sites for single companies.

31) Questions – Demand for Employment Sites

Do you think we should focus on supporting the growth of existing smaller businesses and companies on sub-divided former industrial sites?

There is evidence of demand for large sites for new inward investment in Sandwell from big companies, but the sites available for new business tends to be smaller ones and very few large vacant sites are available.

Do you have any ideas or suggestions on how we might address this issue? Options might include (but not be limited to): -

- **Concentrating on attracting smaller businesses into Sandwell until larger sites become available through natural churn (where businesses move into / out of an area as they grow or change);**
- **Identifying existing larger areas of current employment activity and explore opportunities for improving their attractiveness to the market (e.g. through renewing and improving infrastructure such as parking and access, supporting the improvement of existing buildings and premises, introducing new or additional landscaping);**
- **Identifying opportunities as a Council to actively create sites for large companies or industrial occupiers (e.g. through the council using compulsory purchase powers / buying sites on the open market, or using land they own), even if that means displacing / relocating smaller companies to do so;**
- **Any other suggestion?**

In addition to areas/sites being safeguarded for employment uses, we need to decide whether some types of employment generating **non-industrial and warehousing uses**, such as childcare facilities and small-scale food and drink outlets, may be permitted where it can be demonstrated robustly that they support, maintain or enhance existing business and employment functions.

32) Questions – Non-conforming Employment Uses

Do you agree that these non-conforming employment uses should be addressed in the SLP?

IF so, do you think the SLP should contain a policy addressing what ancillary uses might be appropriate and in what locations (e.g. where there are no suitable facilities within a short walk or where the ancillary use is not one that needs to be in a town centre)?



The employment land policies contained in the draft BCP set out the **types of employment uses** that would be permitted in the areas/sites allocated as strategic or local employment land. These sites would be safeguarded for

- light industrial employment uses (the research and development of products or processes or any industrial process that could be carried out in a residential area without causing detriment to the amenity of the area);
- general industry; and
- storage and warehousing.

Sandwell's SLP intends to carry this protection forward by including many aspects of the proposed BCP employment policies and adapting them to meet Sandwell's purposes.

Local employment sites are those areas where development is supported primarily for new or smaller-scale employment activity. In some cases, housing or other non- ancillary, non-employment uses may be considered on these sites but only where there is robust evidence to demonstrate they are no longer required for employment purposes.

Recent revisions to the national legislation governing changes of use (when buildings can be reused for different types of residential, community, commercial or professional uses without needing planning permission) means that in some cases buildings currently in use for local employment (effectively the light industrial employment use described above) can be reused for things like gyms and shops without needing planning permission.

In the past local employment land in Sandwell has come under pressure from non-employment proposals, such as banqueting suites and other community uses. This has caused problems in some cases as the new uses have been proposed on sites adjacent to uses occupied by general employment uses. Having non-employment uses near heavy industry can cause problems for both sets of occupiers; the "agents of change" principle in the NPPF³⁴ now requires the incomer to ensure that their activities do not adversely impact on adjacent established uses. As an example, incoming industrial users on appropriate and allocated industrial sites adjacent to community or leisure activities would have to use additional resources to ensure their activities did not impact on places used for social events. This in turn could mean potential industrial and employment-generating uses avoiding such sites on viability grounds.

In some locations large-scale **commercial entertainment and community activities** may be appropriate, assuming the likelihood of sufficient parking being available, and events being held during evenings and weekends when areas of employment uses are likely to be less busy. However, these types of activities will generally be more properly located in town and local centres, with good accessibility by public transport; they should be subject to a robust sequential test if they are being proposed outside centres.

In addition, there are other larger-scale activities that are not classed as employment uses (although in some cases they may employ significant numbers of people), but which require large premises away from housing areas or other more sensitive uses. These might include wholesale catering, larger indoor recreational and leisure uses and dog day-care for example.

³⁴Paragraph 187

33. Questions – Alternative Uses in Industrial Areas

Do you agree that local employment estates / land / sites should be retained exclusively for local and small-scale employment uses?

Are there any circumstances where you feel non-employment uses would be appropriate in such areas?

If so, what sort of uses do you think would be appropriate?

- Housing?
- Non-industrial employment uses (e.g. gyms, vets, children's play spaces, dog day-care)?
- Community spaces?
- Banqueting suites and venues?
- Any other use?

Please identify which ones you think would be acceptable and why.



Where else do you think larger community and commercial activities like the examples given above should be located? The preference is for town centre locations in the first instance, as the most sustainable locations, but depending on circumstances this may not be achievable:

- In vacant units on business parks or industrial estates (this would mean the loss of those units to potential occupiers with larger workforces / more job opportunities)
- In large buildings elsewhere in Sandwell (potential for noise, fumes, disturbance etc. may be greater)
- On new development sites in purpose-built premises (costs may be prohibitive for operators)

How do we ensure that if such uses are allowed in employment locations, they do not proliferate / draw trade and activity away from town centres?

- Sequential test (e.g. clear demonstration that no suitable site can be found within an existing centre or be more sustainably located)?
- Proliferation considerations (e.g. no more than X number of similar venues within a set radius)?
- Both?
- Any other criteria?

We think an updated version of the SAD policy on **training and recruitment** will be sufficient. Reference to the Neighbourhood Employment and Skills Plan will need to be removed from an updated SLP policy as it no longer exists. This revised policy will be aligned to the Council's Social Value reference of social, environmental and economic elements and should include developments of over ten units or more of housing and /or 10,000 sqm of commercial floorspace in creating local jobs and providing opportunities for skills development.

34) Questions – Training and Recruitment

We intend to update the existing SAD policy on training and recruitment. Do you agree?

9. INDUSTRIAL LEGACY

The SAD previously contained several policies designed to deal with some of the legacy issues created by Sandwell's historic role as a centre of heavy industry and manufacturing. These policies addressed pollution, industrial safety, hazardous substances and ground conditions.

The policies themselves will be retained in the SLP as they remain relevant to the ongoing remediation and regeneration of Sandwell. However, this is an opportunity for the Council to ensure they are up to date and to include any additional topics that have arisen since 2011 that may need addressing.

The current policy headings are listed below: -

- i. Areas affected by Abandoned Limestone Mines
- ii. Zones Around Hazardous Installations
- iii. New Developments and Hazardous Substances
- iv. Pollution and Contamination Control
- v. Land Affected by Tipped Material Generating Landfill Gas
- vi. Land Affected by Contaminants, Ground Instability, Mining Legacy, Land of Unsatisfactory Load Bearing Capacity or Other Constraints

35) Questions – Industrial Legacy

Are you aware of any additional policy areas relating to Sandwell's industrial legacy that in your view should be addressed in a new land use policy?

If so, what are the main areas of concern for you, and if you can, how would you advise that the council should tackle them?

10. WASTE MANAGEMENT

The BCCS contained a strategic policy on **waste management** that identified several locations across the Black Country where new waste facilities could be developed. Managing waste in a responsible way is an important element of sustainable development and facing up to climate change. This can be achieved in various ways, including: -

- by addressing waste as a resource;
- through minimising waste;
- by managing unavoidable waste in ways that will minimise harmful effects; and
- by providing sufficient waste management capacity to meet current and future requirements of Sandwell.

The SAD contains a policy on the design of new waste management facilities (SAD EMP3) and dealt with more site-specific issues under the work undertaken on the regeneration corridors.

36) Questions – Strategic Waste Management

Do you think that a Strategic Waste policy is still required for Sandwell, to help identify suitable locations for new waste sites?

- **If you do, what do you think it should cover?**



As part of the Black Country Waste Study 2020, a review of **waste management capacity and land availability** was undertaken within the context of the predominantly urban nature of the Black Country, which retains large areas of existing employment uses in adopted plans. However, an ongoing agenda of regeneration projects and initiatives designed to diversify employment, reverse population decline and improve the environment of the Black Country all imply greater challenges to the retention or provision of increasingly nonconforming uses (e.g. waste and recycling facilities and activities).

In most situations, development for housing and high-quality employment will always yield greater revenues than waste management and recovery use. Whilst viable development depends on the interplay of location, abnormal development costs, policy requirements and landowner expectations that can only be evaluated on a site-by-site bases, there are significant areas where land use has changed to housing development – and there is ample evidence of this being an ongoing trend through planning applications and promotions.

At a national level, areas of previously developed land saved for potential waste use are being lost to other forms of development and existing waste capacity is being threatened. This is likely to be a particular issue in the Black Country, where the waste sector is comparatively more important to the local economy than in England as a whole.

As waste facilities are an essential part of the total infrastructure of an area, it is not only important that they are appropriately located but also that policy protection is applied to areas suitable for waste uses, to help achieve the objectives of moving waste up the hierarchy and enabling communities to take responsibility for waste arising in their area.

37) Questions – Protection and Location of Waste Facilities

Do you agree that the SLP should contain a policy protecting Waste Sites from non-conforming development such as residential development?

Should employment areas be identified as suitable locations for the location of new waste facilities?

11. GREENER INFRASTRUCTURE

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.

The definition of infrastructure in this context is wide, including (but not limited to): -

- a) transportation and road-related improvements and projects;
- b) fast broadband;
- c) affordable housing;
- d) renewable energy;
- e) publicly accessible open space;
- f) sustainable drainage;
- g) sport and recreational facilities;
- h) air quality mitigation measures;
- i) residential services (relating to access to employment, health services, fresh food retailing, and education services by sustainable transport means).

There will also be other requirements, such as crime prevention measures, and cross-boundary requirements, such as waste water management. Impacts on the environment can include loss of open space or wildlife habitat, which must be mitigated.

38) Questions – General Infrastructure

Are you aware of any other forms of infrastructure that you think may be required?

39) Questions – Transport Infrastructure

Are you aware of any locations where you think new or improved transport infrastructure may be required?

- This may include public transport, cycle facilities, pedestrian upgrades or highway alterations.

Sandwell's Walking and Cycling strategies combined with the three tiers of Local Cycling & Walking Infrastructure Plans (West Midlands, Black Country and Sandwell) provide the framework for the continued development of a **greener travel network** of, mostly segregated, cycle routes and various pedestrian infrastructure improvements as part of core-walking zones.

Where appropriate, traffic cells or segments can greatly improve public transport penetration in town centres and increase the attractiveness of active modes of travel whilst reducing the negative impacts of motorised traffic. This provides local air quality improvements as well as contributing to carbon reduction targets.

Where possible, road space reallocation should be considered to provide priority for public transport pedestrians and cyclists, particularly on routes that form part of the approved cycle network and/or the core bus network. However, it is recognised that large parts of Sandwell's highway network are made up of relatively narrow, single-carriageway roads where the available road space is limited through competing demands for frontage access, on-street parking etc. Therefore, it is not always possible to reallocate road space for both public transport and cycling or for either in some cases.

39) Questions – Greener Travel Networks

Given the constraints imposed by Sandwell's current highway network, how do you think we should address the need to reduce congestion and encourage a change in travel behaviour towards sustainable and active modes of travel by:-

- **prioritising public transport, ensuring sites have access to reliable public transport infrastructure which may require road space reallocation; or**
- **prioritising active travel (cycling and walking), ensuring sites have access to high quality and safe pedestrian and cycle links and infrastructure which may require road space reallocation; or**
- **a combination of the above; or**
- **Investigating opportunities for reallocating road space for all forms of sustainable transport where reasonable on a location by location basis with minimum impact to the current operation of the highway?**



The need to improve air quality, address carbon emissions and reduce the dependency on the private car requires new development to have an even greater focus on choice of modes for access, including electric vehicle charging infrastructure, use of low emission vehicle technology and provision for cycles, micro-mobility and motorcycles. Smart mobility and mobility as a service should also be recognised for its role in supporting modal choice and **achieving safe access and addressing transport impacts**.

However, it is not only within the design and layout of developments that these issues can be addressed. The location of new development also has an influence on mode choice and the need to travel. Well located developments in highly accessible locations can provide greater opportunities for trips by public transport and active travel modes. Developments should provide direct access to public transport routes and the active travel network. The concept of 15-minute neighbourhoods³⁵, with residents being able to access almost all their day-to-day needs within a short walk or cycle trip, should also help guide both the nature and location of development.

Consideration should also be given to the movement of freight, goods and other courier services on Sandwell's roads when determining location of new development. The level of motor traffic on Sandwell's roads has increased, partly driven by the growing number of trucks, vans, mopeds, and bikes delivering groceries, parcels and food takeaway services to online shoppers' homes. There is a need to reduce the strain placed by e-commerce deliveries on Sandwell's roads by, for example, identifying sites for parcel lockers and incentivising more "Click and Collect" options in order to reduce the volume of home delivery vehicles on the roads.

In addition, maximising access to high speed broadband/digital infrastructure is required to enable smarter working for those who can do so, thus further reducing the need to travel.

40) Questions – Safe access and addressing transport impacts

Do you think we should explore the concept of 15-minute neighbourhoods in the SLP?

Should new developments focus on new innovative infrastructure and emerging technologies such as electric vehicle charging infrastructure, use of low emission vehicle technology and provision for cycles, micro-mobility and motorcycles as part of smart mobility and mobility as a service solutions (such as Mobility Hubs for example) in supporting modal choice?

³⁵<https://www.smarttransport.org.uk/insight-and-policy/latest-insight-and-policy/what-is-a-15-minute-neighbourhood>

The current local plan contains two policies relating to **communications and digital infrastructure**. Times have changed greatly since these policies were first proposed and the new SLP will need to update those policies to reflect the most up-to-date position

SAD policy TEL 1 refers to antennae and masts put up for telecommunications purposes.

We think that the applicants need to demonstrate that the installation is in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP). We therefore propose that TEL 1 will be reviewed / updated to require that all prior approval and full planning applications must be accompanied by a declaration that the proposal, when operational, will meet the ICNIRP.

42) Questions – Communications and Digital Infrastructure

Do you agree with this approach?

SAD policy TEL2 refers to **telephone kiosks**. As times have changed and the type of equipment used for communication has evolved, we think that Policy TEL 2 needs to reflect these changes. Therefore, we propose to amend the policy so that it relates to Digital Infrastructure / Equipment – this includes Kiosks and Digital Interactive Finger Posts. This will enable siting and design to be controlled so that they do not detract from the visual amenities of the street scene.

43) Questions – Telephone Kiosks

Do you agree with this approach?

Given the importance of **fast and reliable broadband** and associated digital infrastructure to all aspects of modern society, a new strategic policy is proposed, based on the draft policy produced for the BCP. Planning policy can play an important role in helping to address the key digital connectivity infrastructure needs of Sandwell. The draft policy sets out proposals for ensuring the provision of full fibre broadband connectivity is considered in all new major development proposals. It also sets out the approach for supporting and assessing 5G network infrastructure proposals (and any successor network infrastructure).

44) Questions – Broadband

Do you agree with this approach?

The current SAD contains a specific policy on **taxis and private hire vehicles**, requiring the provision of taxi ranks where appropriate in new development and where uses generate large flows of visitors. It is proposed to retain and review / update this policy where town centre regeneration and development is proposed.

45) Questions – Taxis and Private Hire Vehicles

Do you agree with this approach?



12. ENHANCING THE NATURAL AND BUILT ENVIRONMENT

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.

The draft Black Country Plan contained a suite of policies relating to the **natural environment**, many of which will be used to strengthen Sandwell's own approach to the conservation and improvement of the natural environment. The relevant policies cover the following areas (see also appendix A):

- Nature Conservation – ENV1
- Nature Recovery Network and Biodiversity Net Gain – ENV3
- Provision, retention and protection of trees, woodlands and hedgerows – ENV4
- Historic Character and Local Distinctiveness of the Black Country – ENV5
- Geodiversity and the Black Country UNESCO Global Geopark – ENV6
- Canals – ENV7

National planning and environmental policy sets out a requirement for all qualifying new development to provide a minimum of 10% **biodiversity net gain**. This means that where habitat or the natural environment is lost or adversely impacted by development, developers will have to provide as a minimum an additional 10% of replacement habitat on top of compensating for what was already there (e.g. if ten trees are felled on a site being developed, a minimum of 11 replacements will need to be planted). This compensatory habitat will be sought on the site being developed itself in the first instance, but where this cannot be achieved, the regulations allow for off-site habitat creation or enhancement somewhere nearby.

Only if this too cannot be delivered, and as a last resort, will developers be able to offer other types of compensation such as payments or contributions to habitat and ecological works beyond the immediate area (known as biodiversity credits). If developers cannot produce biodiversity net gain within Sandwell itself, we are considering whether we should seek a higher percentage of credits than 10%, to offset the lack of a direct contribution to Sandwell's biodiversity.

Local authorities can help identify offsite biodiversity opportunities to developers through pinpointing local opportunities / sites suitable for biodiversity habitat creation in line with their identified aims and objectives. Given the highly urban nature of Sandwell, it will not always be possible to provide replacement habitats on development sites themselves, so the Council may want to identify sites and projects beyond the immediate vicinity of the actual development in some cases, perhaps by identifying / allocating a potential "receptor" site or sites in the borough. These sites (if allocated) will be subject to prior assessment, provide for a suitable project that contributes to increasing biodiversity in Sandwell and form part of the Black Country Nature Recovery Network.

Having a Local Plan policy that links BNG to the delivery of local strategic priorities (such as those in the Nature Recovery Network strategy) will be helpful.

46) Questions – Biodiversity Net Gain

Do you think the SLP should contain a policy on retaining offsite biodiversity net gain in Sandwell?

If so, how do you think the Council should achieve this?

Please identify which of the following options you prefer; you can pick as many as you like or suggest something different.

Identify privately-owned sites as receptors for BNG credits and allocate them in the SLP?

Identify Council-owned sites as receptors for BNG credits and allocate them in the SLP?

Support wider landscape-scale schemes such as the Natural England Purple Horizons project (restoring and connecting fragmented heathlands to create a mosaic of heathlands, wetlands, woodlands and grasslands between Cannock Chase and Sutton Park) that are nearby but not necessarily in Sandwell itself?

A combination of private and public approaches?

Something else (please specify)?

Are you the owner of any sites or land within Sandwell that you think may be suitable for allocation as a potential receptor site for biodiversity net gain (bearing in mind it would then be protected from further development or change for at least 30 years through a covenant agreement)?

If so, would you be willing to have your site allocated for this purpose in the SLP³⁶ (assuming it was considered suitable after an ecological assessment)?

³⁶Please refer to the current SLP Call for Sites consultation if you wish to advise us in more detail of any potentially suitable sites you own or are aware of.

Do you think we should explore a requirement for additional biodiversity net gain credits (e.g. more than 10% minimum) should developers be proposing to purchase them for schemes outside Sandwell?

Being in **green spaces** boosts various aspects of thinking, including attention, memory and creativity, in people both with and without depression³⁷, as well as producing positive improvements in physical and mental wellbeing.

All features of the outdoor environment contribute to environmental infrastructure, including natural and semi-natural habitats, parks and other open spaces, formal and informal recreation and sports facilities, historic buildings and landscapes, the public realm of spaces and streets, rivers, canals and drainage systems.

Policy EOS 1 of the SAD identified a green space hierarchy in Sandwell, intended to -

“... analyse existing provision of green /open space, to identify strengths and weaknesses in the provision, and to guide decisions about improvements, new and replacement provision, and development proposals which impact on the provision.”

The hierarchy identified types of green space, ranging from Regional / Sub Regional Green Space, such as Sandwell Valley and Strategic Open Space such as the Rowley Hills down to local formal and informal areas of open space, such as gardens, playgrounds and landscaped public spaces. We intend to revisit and reassess the hierarchy and its current accessibility standards as part of work on the new local plan.

47) Questions – Green Spaces

Do you agree with this approach?



³⁷<https://www.mentalhealth.org.uk/our-work/research/nature-how-connecting-nature-benefits-our-mental-health>

The **Rowley Hills** are a range of four hills – Turner’s Hill, Bury Hill, Portway Hill and Darby’s Hill – located within Sandwell (with a small part of them lying within Dudley). Together they form a ridge that divides the Black Country into two parts with distinctly differing topographic features. The ridge also coincides closely with the main watershed of England³⁸. Turner’s Hill at 271 m (870ft) is the highest point, visible from most parts of the Black Country and is a distinctive landscape feature that can be seen from the adjacent motorway and railways.

Traditionally the Hills have been the location for both stone quarrying and coal mining but are now mostly used for informal recreation. The Hills have importance both for historic landscape reasons and for their value for nature conservation. Most of the Rowley Hills have either SLINC (Site of Local Importance for Nature Conservation) or SINC (Site of Importance for Nature Conservation) designations. There is a Local Nature Reserve located on Portway Hill. The Rowley Hills also form an important part of the Black Country Global Geopark designation and contain sites of geological importance and interest.

The extent of the identified Rowley Hills area is around 135ha³⁹ (of which Turner’s Hill covers approximately 7.3ha, Portway Hill and Bury Hill together cover around 38ha and Darby’s Hill covers 4ha) and is encapsulated within the urban areas of Sandwell and Dudley.

Evidence suggests that there is pressure for additional development on the Rowley Hills. To date, the Council has been successful in preventing inappropriate development from occurring, which has been helped by SAD policy EOS3, formal recognition of the ecological and geological value of the area and through the adoption of the Rowley Hills District Plan in 1987. This sought to maintain and improve the area as open space for recreation and to protect the skyline from inappropriate and intrusive development.

The continued protection of the open and undeveloped nature of the Rowley Hills could also be achieved if the area (or parts of it) were to be designated as green belt or Local Green Space, as set out in the NPPF.

Green belts act as a buffer between towns, and between towns and the countryside. The green belt designation is a planning tool and the aim of green belt policy is to prevent urban sprawl by keeping land permanently open. They are protected from inappropriate development by planning legislation and apart from some specified exceptions, new development is not permitted within them.

A Local Green Space designation allows communities to identify and protect green areas of importance to them through its specific allocation in a local plan; the designation allows for land to be protected along similar lines to the green belt provided it is: -

“... a) in reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.”⁴⁰

While the area of the hills in total is significantly larger than many other areas of Local Green Space across the country, the Open Spaces Society advises that when considering the size of the proposed designation;

³⁸The ridge forms part of the east/west watershed between the River Severn and the River Trent, with rainfall on the western side flowing into the Bristol Channel via the Severn, and rainfall on the eastern side draining into the North Sea via the Trent

³⁹Identified via the Policies Map for the SAD

⁴⁰Paragraph 102, NPPF (2021)

The criteria may differ between settlements depending on their physical size and population. The areas would normally be fairly self-contained with clearly-defined edges. Blanket designation of open countryside adjacent to settlements will not be appropriate ...⁴¹.

Given the location of the Rowley Hills in relation to surrounding development and their extensive public use, value for nature and the environment and importance to the character and amenity of the area, we are keen to consider how they might be protected and their various functions supported.

48) Questions – The Rowley Hills

The Rowley Hills have been protected to date from development that might have affected its visual, historic and ecological amenity. They are subject to a variety of policies / allocations that have prevented most inappropriate development from taking place.

- **Do you think the current level of protection is sufficient to continue safeguarding the distinctive character, environment and visual amenity of the Hills?**
- **Do you think the level of protection needs to be increased?**
- **Do you think there is scope for any residential or economic development in the area, assuming it did not have an impact on the Hills' ecology, historic character, geological importance⁴² or skyline?**
- **If so, what sort / level of development would be appropriate in your view and why?**

Do you think the Rowley Hills should be allocated as Local Green Space in the SLP?

- **Can you explain why you think it should be?**
- **If you disagree, can you explain why you think it doesn't need this designation?**

Do you think the Rowley Hills should be designated as green belt?

- **Can you explain why you think it should be?**
- **If you disagree, can you explain why you think it doesn't need this designation?**

⁴¹<https://www.oss.org.uk/need-to-know-more/information-hub/local-green-space-designation/#information>

⁴²As identified on the Black Country Geopark website (<https://blackcountrygeopark.dudley.gov.uk/sites-to-see/the-rowley-hills/>) and where appropriate by specialist reports

Government policies refer to **heritage assets** as any building, monument, place, area or landscape that have heritage interest. Some heritage assets are formally designated under legalisation for example, listed buildings, registered parks and gardens and conservation areas. Other assets have local importance but are not formally designated by legislation.

There are many pressures on heritage assets - to modernise or demolish historic buildings, change their uses, develop within heritage conservation areas and remove landscaping. Given the irreplaceable contribution heritage assets make, national guidance is clear that it is important that heritage assets and their settings are preserved or enhanced as a reminder of the history and evolution of the area.

Some heritage assets are specifically identified as being 'at risk' on Historic England's 'Heritage at Risk' Register. We will continue to pursue funding opportunities and work with landowners to secure improvements to these heritage assets wherever possible.

The NPPF defines **undesigned heritage assets** as follows:

Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.

Local heritage assets that are not formally designated are currently being reviewed and will be set out in a **Local List**. We could seek to introduce specific policies and controls to prevent the loss of assets that contribute to the local identity of Sandwell. This could help to protect more unlisted heritage features. It may also help prevent some of these buildings being redeveloped for other uses. A Local List does not give the buildings on it the same level of protection as the national list of buildings of architectural or historic merit but does mean their importance can be taken into account as a material consideration when planning decisions are made that would impact on them.

Heritage assets are an irreplaceable part of the Borough's unique character and identity and must be considered when new **design in the historic environment** is being proposed. Heritage significance will be assessed according to interest as defined in the National Planning Policy Framework (NPPF).

Development affecting the significance of an asset may include, but is not limited to:

- the introduction of new structures /objects;
- alterations;
- complete or partial demolition;
- removal of buildings /features or parts thereof;
- development in the curtilage of an asset or demolition of assets within the curtilage of a structure;
- the introduction of signage or advertisements;
- changes of use (including the use of open spaces);

- subdivision or fragmentation;
- changes to landscaping;
- the removal of built or landscape features or parts thereof; or
- any other form of development which fails to conserve and enhance the asset or its setting.

Enhancement of a heritage asset can take many forms, including, but not limited to:

- restoration;
- repair;
- removal of inappropriate development;
- increasing access;
- increasing visibility;
- increasing the educational value;
- conversion to a more appropriate use; or
- enhancement of the asset's setting.

Only rarely will there be no opportunity for enhancement.

An issue that is becoming of increasing importance to the protection and retention of the character and amenity of heritage assets is that of climate change. Local authorities are having to balance their duty to enhance and protect the historic environment with their commitment to deliver climate change adaptation and mitigation, which in some cases may involve alterations and additions to historic buildings or changes to their settings or to historic landscapes.



49) Questions – Heritage Assets

Do we need to prepare a policy to support the adoption of a Sandwell Local List of buildings of historic / architectural merit?

Do we need to prepare a new policy to address the safeguarding of heritage assets when mitigating against and adapting to the climate change emergency?

Do we need to consider the introduction of special controls that prevent the demolition of non-designated, locally important heritage assets⁴³?

There are just over 200 **listed buildings**⁴⁴ in Sandwell. The National Heritage List for England is the official and up to date, register of all nationally protected historic buildings and sites in England - listed buildings, scheduled monuments, protected wrecks, registered parks and gardens, and battlefields. Listing marks and celebrates a building's special architectural and historic interest, and also brings it under the consideration of the planning system, so that it can be protected for future generations. The older a building is, and the fewer the surviving examples of its kind, the more likely it is to be listed.

There are five designated parks and gardens (all listed at Grade II);

- Brunswick Park
- Dartmouth Park
- Great Barr Park
- Victoria Park
- Warley Park

⁴³An Article 4 direction – this can be used to withdraw permitted development rights where it is considered necessary to safeguard the special interest of local heritage assets.

⁴⁴<https://historicengland.org.uk/listing/the-list/results/?searchType=NHLE+Simple&search=Sandwell>

Conservation Areas can be created where a local planning authority identifies an area of special architectural or historic interest, which warrants careful management to protect that interest. An area must be identified by the local authority as having a definite architectural quality, character or historic interest to merit designation. Research by the London School of Economics has found that people value living in conservation areas. This is evidenced by properties in conservation areas commanding higher prices and greater price appreciation, even after adjusting for location and other factors that affect prices⁴⁵.

There are currently nine conservation areas in Sandwell, mainly located in Sandwell's historic town centres. Many of the conservation areas have not been reviewed since they were originally designated.

Conservation area name	Last appraised
Windmill End	Never
High Street, Smethwick Town Centre	May 2004
Cape Hill Town Centre, Smethwick	Apr 2005
High Street and Crocketts Lane, Smethwick	Apr 2005
Galton Valley, Smethwick	Jun 2005
High Street, West Bromwich	Apr 2007
Factory Locks, Tipton	Jun 2008
Church Square, Oldbury	Jun 2009
Market Place, Wednesbury	Aug 2017

Within those areas, it is likely that some development will have taken place over time, such that the current adopted boundaries of the area may not be the most appropriate ones; for example, new development might mean that historic features have been newly identified, changed or lost and so the extent of the conservation area may need to change to reflect that.



⁴⁵<https://historicengland.org.uk/advice/your-home/owning-historic-property/conservation-area/>

Wednesbury High Street Heritage Action Zone - one specific area identified on the Register is Wednesbury Town Centre Conservation Area. Sandwell Council have successfully applied for funding to create a Heritage Action Zone to improve the quality of the area and support heritage-led regeneration.

Heritage Action Zones are an initiative funded by the Department for Culture, Media and Sport and administered through Historic England in partnership with local authorities, to create economic growth and improve quality of life in places that are rich in heritage and full of promise; unlocking their potential and making them more attractive to residents, businesses, tourists and investors.

To be eligible, the area needs to be a conservation area 'at risk'. Wednesbury Market Place conservation area was selected because of its many fine buildings and underlying high quality public realm.

50) Questions – Conservation Areas

Some of the conservation areas in Sandwell are in centres where there is or has been a lot of pressure for development and growth. As a result, any previous appraisals undertaken when they were first designated are likely to be out of date.

Other conservation areas are unlikely to have changed much since they were first adopted.

Do you think the Council should: -

- **undertake a review of all conservation area whether they have been subject to any development pressure or not;**
- **undertake comprehensive appraisals of those conservation areas where there has been a significant amount of development or other physical changes (such as new infrastructure or changes to road layouts, etc.), to ensure the appraisals remain relevant and up to date for making decisions on planning applications;**
- **leave the current conservation area appraisals as they are and accept that the contribution the appraisals can make to the determination of planning applications and appeals will be limited?**

Do you think the Council should also be exploring: -

- **whether there are any new conservation areas that could be designated; or**
- **whether any current conservation areas no longer carry sufficient interest and importance to be retained as a conservation area?**
- **Do you know of any areas of historic interest in your local area that you think could be made into a conservation area?**

Sandwell's **archaeological heritage** is a vital component of the historic environment, comprising many hundreds of sites, buildings and structures. All archaeological remains, whether structures, earthworks or buried deposits potentially hold the key to a better understanding of the borough's past. Sandwell has identified several areas of archaeological importance and therefore when new development is proposed within these areas an archaeological desk-based assessment should accompany the planning application. A record of all Sandwell's known archaeological sites is kept on the Historic Environment Record (HER), which is available to view by appointment.

Sandwell does not employ a borough archaeologist. The SAD contained a policy (SAD HE 5 - Archaeology & Development Proposals) that provided guidance on the requirements for developers dealing with sites where archaeological remains were anticipated to exist on sites and it is intended to revisit and revise this policy as required.

51) Questions – Archaeology

Do you agree with the proposal to update the existing SAD policy on archaeology?



The Black Country contains a wealth of geological history and assets, recognised by its recent designation as a **UNESCO Global Geopark**⁴⁶. A Global Geopark is a single, unified geographical area where sites and landscapes of international geological significance are located. It is an area of great geological significance, managed with three main objectives in mind:

- a) to protect the geological landscape and the nature within it;
- b) to educate visitors and local communities; and
- c) to promote sustainable development, including sustainable tourism.

The draft BCP proposed a new policy for the Black Country Geopark (Policy ENV6) and it is intended to include that policy in the SLP

52) Questions – Black Country Geopark

Do you agree with the proposal to include a policy on the Black Country Global Geopark?

Are you aware of any features of geological interest in your area that you want to bring to our attention?

⁴⁶<https://blackcountrygeopark.dudley.gov.uk/bcg/>

APPENDIX A – draft Black Country Plan policies - summary

BCP policy	Summary of policy contents
Policy CSP1 – Development Strategy	Provides the overarching spatial strategy for the Black Country, setting out the scale and distribution of new development for the Plan period.
Policy CSP2 – The Strategic Centres and Core Regeneration Areas	Sets out the strategic approach for the growth network, consisting of the Strategic Centres and Core Regeneration Areas, which is the primary focus for regeneration and infrastructure investment to support the delivery of regionally significant growth and promote wider benefits to Black Country communities.
Policy CSP3 – Towns and Neighbourhood Areas and the green belt	Sets the strategic approach for the Towns and Neighbourhood Areas and the Green Belt, essentially all development outside the centres and regeneration areas (CSP2).
Policy CSP4 - Achieving well-designed places	Supports the development of places and buildings providing a range of functions, tenures, facilities, and services, intended to support the needs of diverse local communities. Promotes high quality and sensitive design for spaces and buildings, reflecting the character of the area and its heritage
Policy CSP5 - Cultural Facilities and the Visitor Economy	Supports the protection, promotion and expansion of existing cultural facilities, visitor attractions and associated activities to ensure their role as key economic drivers stimulating and regenerating the local economy is supported and enhanced.
Policy GB1 – The Black Country Green Belt	Protects local green belt from inappropriate development unless very special circumstances apply.
Policy GB2 – Compensatory Improvements for Loss of Green Belt	Manages the protection of green belt where development takes place and compensatory improvements to remaining green belt is required.
Policy GB3 – Extensions and Replacement Buildings in the Green Belt	Sets out guidance on changes to existing buildings and uses in the green belt.
Policy DEL1 – Infrastructure Provision	Sets out how the BCA will secure infrastructure provision from future planned development. It also sets out the requirement for viability evidence where, in exceptional circumstances, proposals are unable to comply with the policies of the BCP.
Policy DEL2 – Balance between employment land and housing	Sets out the approach for assessing windfall employment and housing developments, ensuring they are in suitable and sustainable locations.
Policy DEL3 – Promotion of Fibre to the Premises and 5G Networks	Sets out proposals for ensuring the provision of full fibre broadband connectivity is considered in all new major development proposals. It also sets out the approach for supporting and assessing 5G Network infrastructure proposals.

BCP policy	Summary of policy contents
Policy HW1 – Health and Wellbeing	Provides a context for how health and wellbeing are influenced by planning and how to improve the health impacts of new developments and minimise negative impacts.
Policy HW2 – Healthcare Infrastructure	Sets out requirements for the provision of health infrastructure to serve the residents of new developments.
Policy HW3 – Health Impact Assessments (HIAs)	Provides for the individual Black Country Authorities to require Health Impact Assessments for development proposals, in line with locally determined criteria, to be set out in local development documents.
Policy HOU1 – Delivering Sustainable Housing Growth	Identifies the amount of housing needed across the Black Country until 2039 to meet predicted housing need.
Policy HOU2 – Housing Density, Type and Accessibility	Directs that the new homes delivered over the plan period are in places with good sustainable transport access to key residential services and include a mix of types and densities which are appropriate to their location and help to meet local needs.
Policy HOU3 – Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing	Directs that a sufficient proportion of new homes provided over the plan period should be affordable and wheelchair accessible, and enough plots should be provided to meet local demand for self-build and custom build housing.
Policy HOU4 – Accommodation for Gypsies and Travellers and Travelling Showpeople	Aims to provide sufficient, appropriately designed and integrated sites to accommodate the needs of travelling communities over the plan period.
Policy HOU5 – Education Facilities	Guidance on the provision of educational facilities, including that they can be accessed easily by sustainable forms of transport and meet the variety of needs for different age groups and educational needs.
Policy HOU6 – Houses in Multiple Occupation	Addresses issues around the provision of HMOs and sets out criteria to be met when planning applications are made for them.
Policy EMP1 – Providing for Economic Growth and Jobs	Seeks to ensure a sufficient quantum of development opportunities are provided to meet the demand for economic growth and support the diversification of the Black Country economy.
Policy EMP2 – Strategic Employment Areas	Provides for a sufficient stock of Strategic Employment Land suitable for a growing and diversified economy.
Policy EMP3 – Local Employment Areas	Makes provision for those types of industrial, logistics and commercial activities that do not need to be situated in Strategic Employment Areas and are not appropriate for town centres or residential locations.

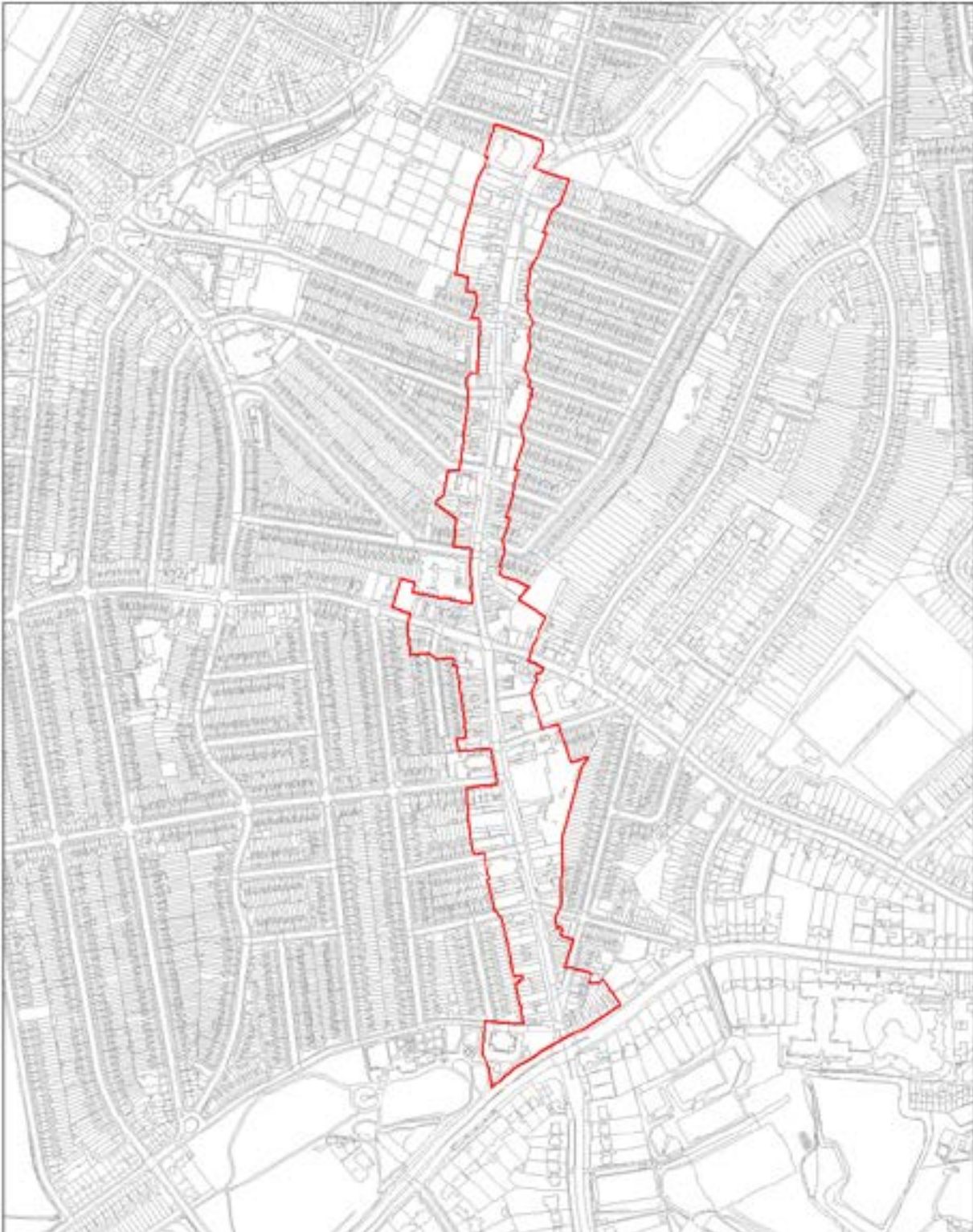
BCP policy	Summary of policy contents
Policy EMP4 – Other Employment Sites	Provides a flexible policy framework to guide development proposals within older industrial areas where sites and premises may be suitable for redevelopment for a continued employment use, or to alternative uses such as housing.
Policy EMP5 – Improving Access to the Labour Market	Requires proposals for large-scale employment generating development to demonstrate that the new jobs are accessible to as many of the Black Country's residents as possible, especially those in the most deprived areas or priority groups.
Policy CEN1 – The Black Country Centres	Sets out the overall priorities and strategy for centres and defines the hierarchy of centres.
Policy CEN2 – Tier One: Strategic Centres	Identifies the four strategic centres of Brierley Hill, Walsall, West Bromwich, and Wolverhampton and sets out the approach and priorities for them in promoting appropriate levels of diversification and flexibility so that investment and regeneration can be maximised.
Policy CEN3 – Tier Two Centres	Supports the important local function provided by Tier Two Centres, particularly convenience retail provision, and their future diversification and regeneration of town centres.
Policy CEN4 – Tier Three Centres	Protects and supports the large network of centres that provide day-to-day convenience shopping and local service needs.
Policy CEN5 – Provision of Small-Scale Local Facilities	Applies to proposals for small-scale local facilities (centre uses and complementary uses including social infrastructure and community uses) not in a centre and intended to meet local community needs.
Policy CEN6 – Edge-of-Centre and Out-of-Centre Development	Sets out robust requirements that will ensure that investment in centres is maximised and significant adverse impacts are prevented by managing edge of centre and out of centre proposals over a certain size.
Policy TRAN1 - Priorities for the Development of the Transport Network	Sets out the strategic approach to delivering an integrated, modernised and sustainable transport network through providing sufficient land in accessible locations and identifying and protecting key transport networks.
Policy TRAN2 - Safeguarding the Development of the Key Route Network	Identifying capital improvements and management strategies to ensure the Key Route Network meets its function of serving the main strategic demand flows of people and freight across the Black Country.
Policy TRAN3 - Managing Transport Impacts of New Development	Requires planning proposals to identify and mitigate transport-related impacts.

BCP policy	Summary of policy contents
Policy TRAN4 - The Efficient Movement of Freight	Supports the movement of freight across the Black Country by sustainable modes of transport and through targeted network improvements and links with the rail network.
Policy TRAN5 - Creating Coherent Networks for Cycling and for Walking	Sets out the intention to develop a strategic cycling network across the Black Country using existing cycle routes and common cycle infrastructure; ensure locations are accessible to pedestrians and cyclists.
Policy TRAN6 - Influencing the Demand for Travel and Travel Choices	Identifies priorities for traffic management and travel choices, promoting sustainable transport and park and ride.
Policy TRAN7 - Parking Management	Sets out the requirements for the sustainable delivery and management of parking in centres and elsewhere.
Policy TRAN8 - Planning for Low Emission Vehicles	Supports the use of and infrastructure for low emission vehicles.
Policy ENV1 – Nature Conservation	Sets out the strategic framework for the protection and enhancement of nature conservation across the Black Country, relating to protected sites, species, habitats and geological features.
Policy ENV2 - Development Affecting Special Areas of Conservation (SACs)	Sets out the need to protect special areas of conservation across the Black Country from adverse impacts caused by development.
Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain	Sets out how development proposals will be required to consider the Nature Recovery Network Strategy and how biodiversity net gain would be secured.
Policy ENV4 – Provision, retention and protection of trees, woodlands and hedgerows	Supports and protects a sustainable, high-quality tree population and will aim to significantly increase tree cover across the area; supports the planting of replacement trees and the provision of additional trees where appropriate; supports the protection of hedgerows.
Policy ENV 5 - Historic Character and Local Distinctiveness of the Black Country	Aims to ensure that where historic character persists, and development is proposed, it should be conserved, and efforts made to ensure that the Black Country's historic environment is fully appreciated and enhanced in terms of its townscape, landscape and individual heritage assets.
Policy ENV6 - Geodiversity and the Black Country UNESCO Global Geopark	Sets out that new development should have regard to the conservation of geological features and should take opportunities to achieve gains for conservation through the form and design of development.
Policy ENV7 – Canals	Identifies the need to protect and enhance the canal network where possible and recognises its role in and opportunities for leisure, recreation, nature conservation, design and the historic environment.

BCP policy	Summary of policy contents
Policy ENV8 – Open Space and Recreation	Recognises the role of open space in promoting good design, healthy communities, leisure and recreation, conservation and wildlife protection. Promotes the need for up to date open space standards.
Policy ENV9 – Playing Fields and Sports Facilities	Requires the retention of sports pitches and playing fields and their enhancement where possible; guides the delivery of compensatory provision should a facility be lost.
Policy ENV10 – Design Quality	Sets out the requirements for design across the Black Country, including incorporating national design standards, space standards, road safety and crime prevention principles; identifies the elements needed to produce high-quality design in the context of the Black Country.
Policy CC1 – Increasing efficiency and resilience	Sets out the principle of designing, constructing and using buildings to mitigate and adapt to climate change and promote the low / zero carbon approach.
Policy CC2 – Energy Infrastructure	Supports the provision of decentralised energy networks – district heating, linking new development to sources where available or making provision for when they might become available; onsite energy provision.
Policy CC3 – Managing Heat Risk	Minimising internal heat gain and tackling the urban heat island effect through appropriate materials, design and landscaping; e.g. energy-efficient design, shading, albedo, trees, green roofs / walls etc.
Policy CC4 – Air Quality	Promotes initiatives to improve air quality such as walking, cycling and electric changing points; promotes public transport; need to provide and protect open spaces and tree cover; minimise commuting. New development should be air quality neutral and indoor air quality should be considered.
Policy CC5 – Flood Risk	Requires the risk assessment of flooding for new development. Promotes the naturalisation of urban water courses, opening up culverts, protection of groundwater and prevention of downstream flooding.
Policy CC6 - Sustainable drainage and surface water management (SuDS)	Promotes the use of SuDS; proposals should include details of adoption, maintenance and management. Surface water flows should be reduced to equivalent greenfield runoff rates unless this is not viable.
Policy CC7 – Renewable and Low Carbon Energy and BREEAM Standards	Supports development using renewable or low carbon energy sources where the proposal accords with local and national guidance and wouldn't harm the local, natural and historic environment.

BCP policy	Summary of policy contents
Policy W1 – Waste Infrastructure – Future Requirements	Sets out the overall strategy and principles for waste management in the Black Country and the types of waste development that will support this; identifies how much new waste management capacity is required.
Policy W2 – Waste Sites	Seeks to safeguard and retain the capacity of existing waste facilities to maintain the existing waste management capacity and address the Black Country's resource and infrastructure needs.
Policy W3 – Preferred Areas for New Waste Facilities	Sets out the identification and delivery of new waste management facilities will make a significant contribution towards meeting new capacity requirements.
Policy W4 – Locational Considerations for New Waste Facilities	Promotes the direction of waste management facilities towards locations where they are likely to generate maximum benefits in terms of co-location, provide supporting infrastructure for other uses and minimise potential harmful effects on the environment and local communities.
Policy W5 – Resource Management and New Development	Sets out the need for managing material resources – including waste - in a responsible way as an important element of sustainable development.
Policy MIN1 - Mineral Production – Requirements	Identifies the requirements for production of aggregate minerals and industrial minerals over the plan period, having regard to national policy guidance, the likely demand, the constraints to working them, and the contribution from imports of them from other areas.
Policy MIN2 - Minerals Safeguarding	Sets out how the most important mineral resources in the Black Country, and sites that are expected to be producing, processing or transporting minerals and mineral products, will be protected from other types of development that could compromise their continued operation.
Policy MIN3 - Preferred Areas for New Mineral Development	Identifies the preferred areas for mineral extraction and other types of mineral development in the Black Country.
Policy MIN4 - Managing the Effects of Mineral Development	Sets out the requirements that planning applications for mineral working and minerals infrastructure will be expected to address.

APPENDIX B – Town Centre Boundaries



Bearwood Town Centre

Scale



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Blackheath Town Centre

Scale

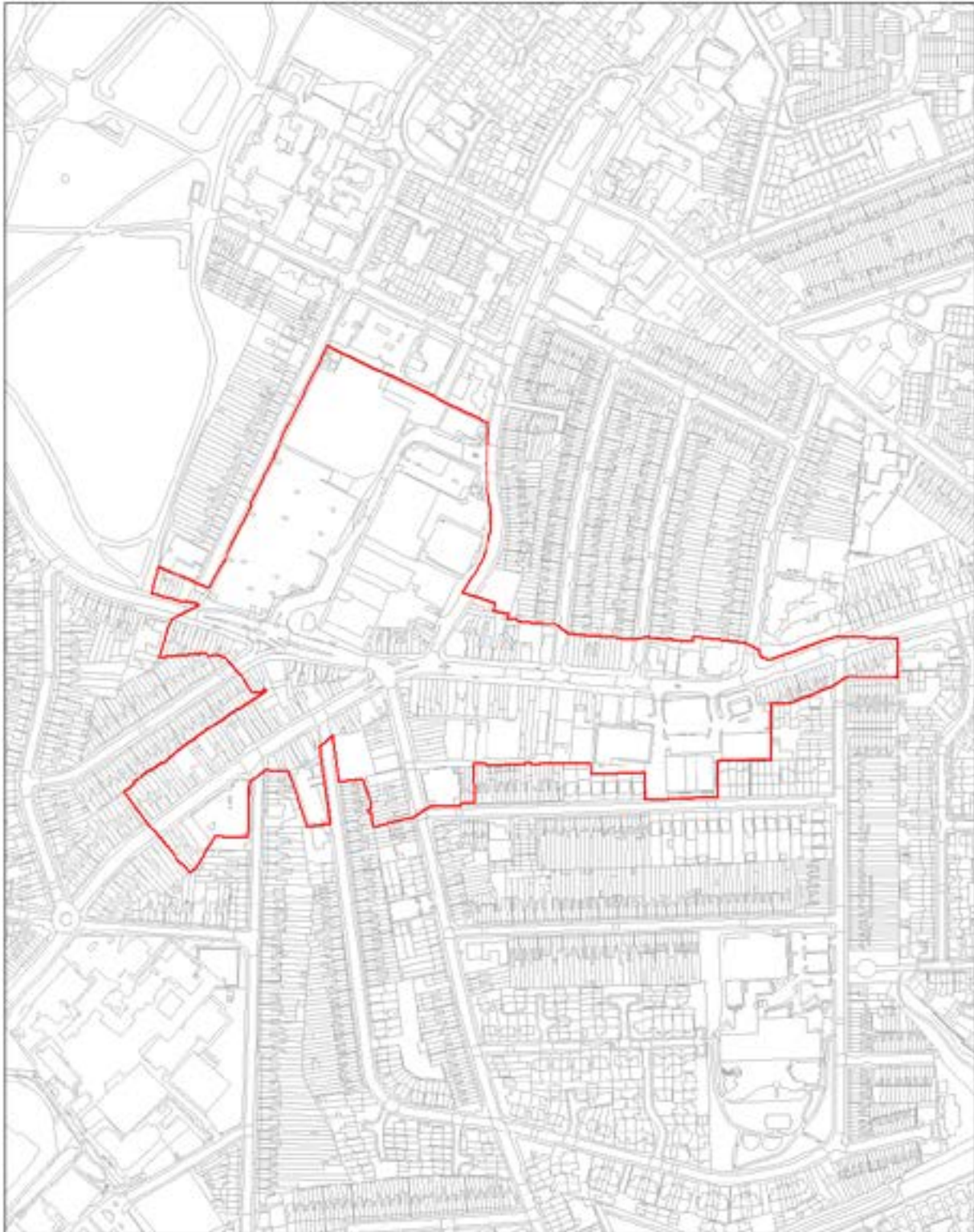


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Cape Hill Town Centre

Scale

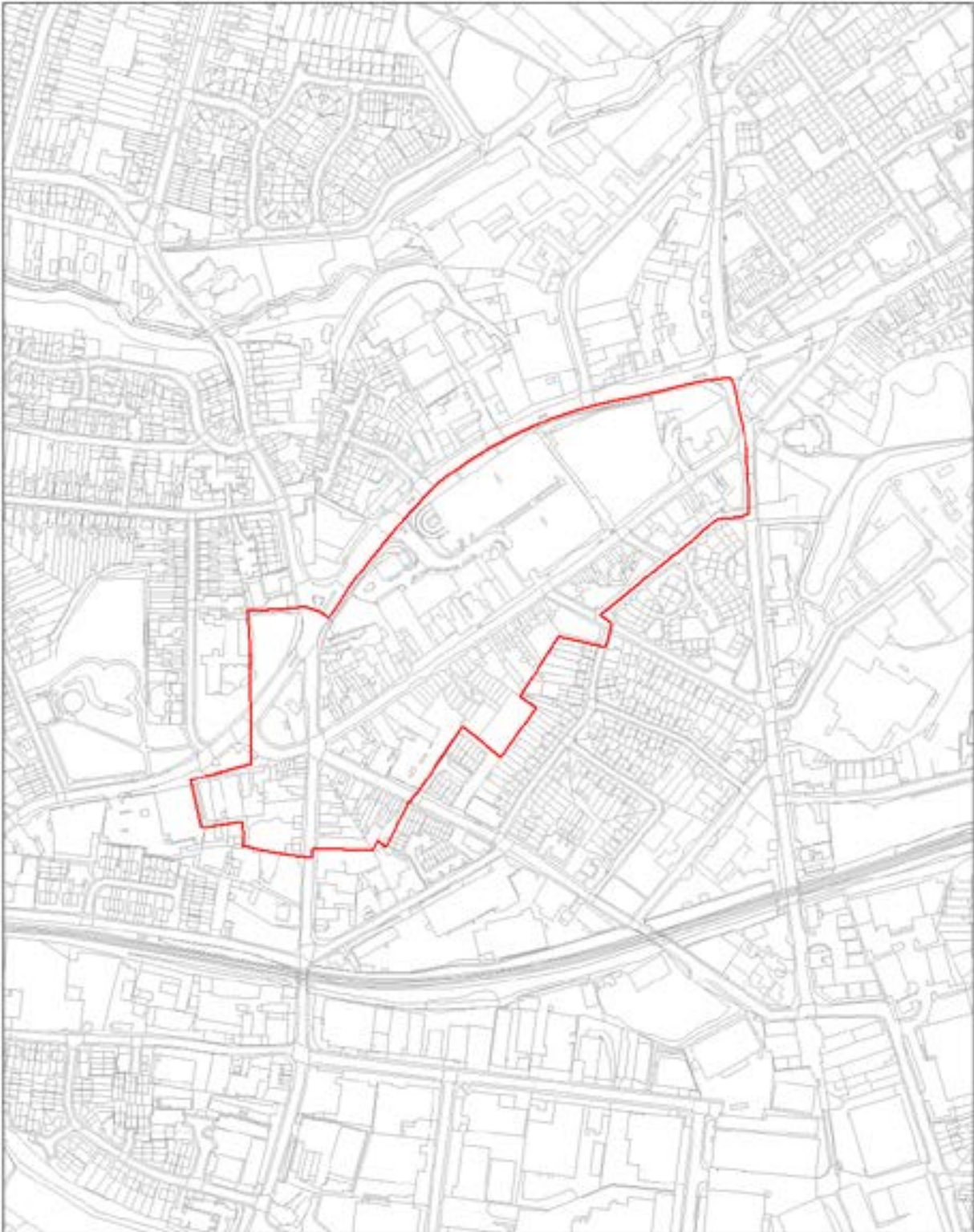


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Cradley Heath Town Centre

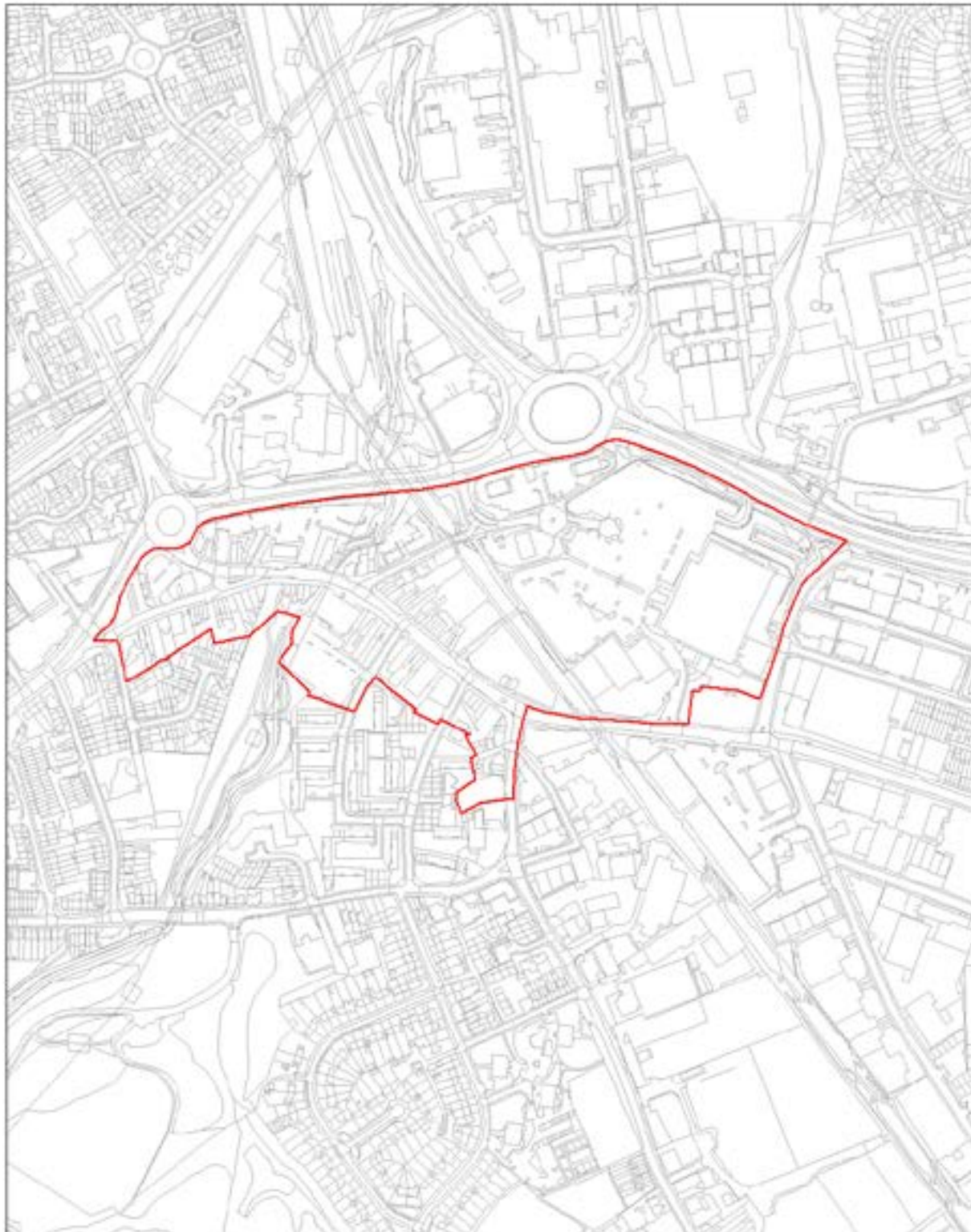
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Great Bridge Town Centre

Scale



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Oldbury Town Centre

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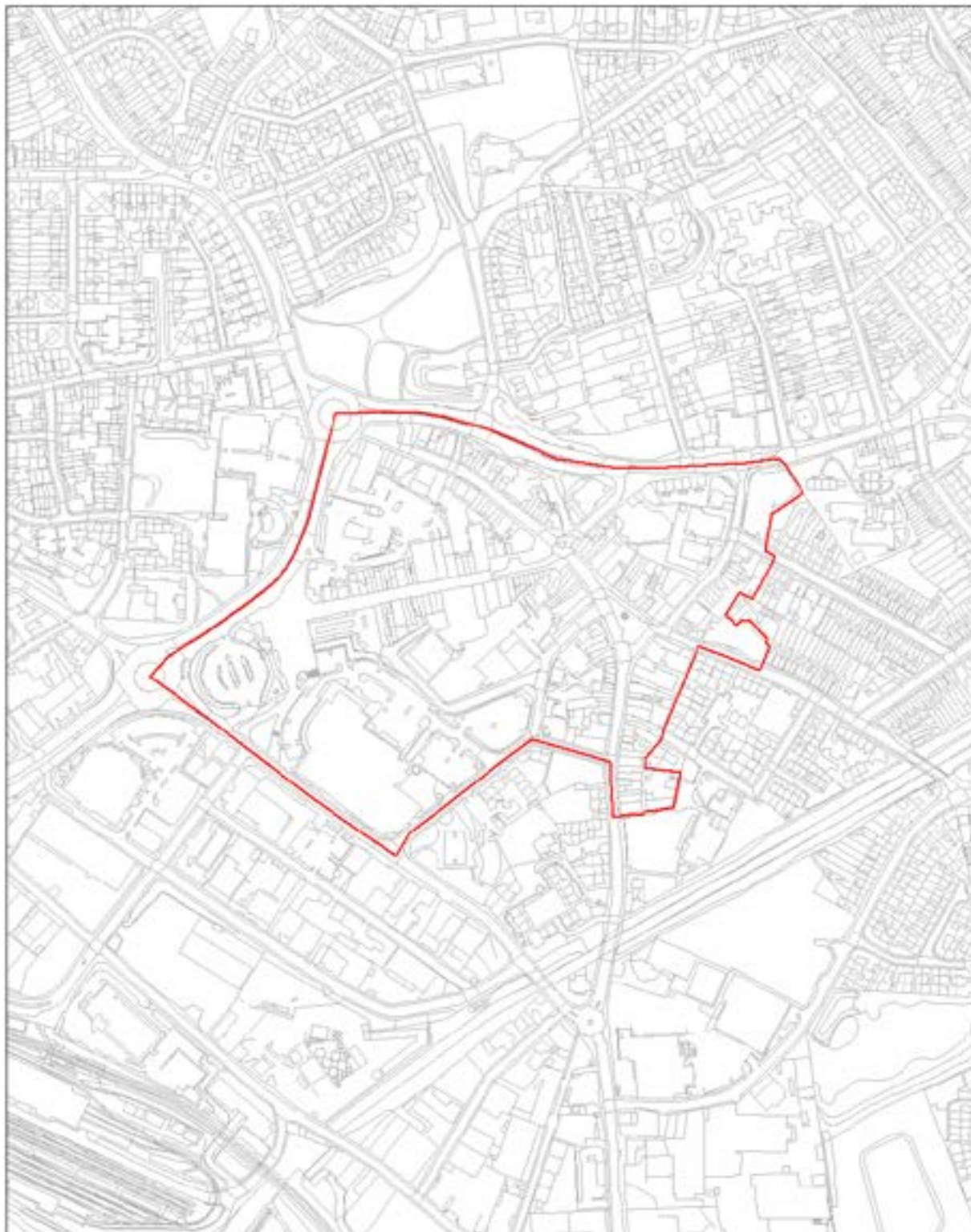


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Wednesbury Town Centre

Scale

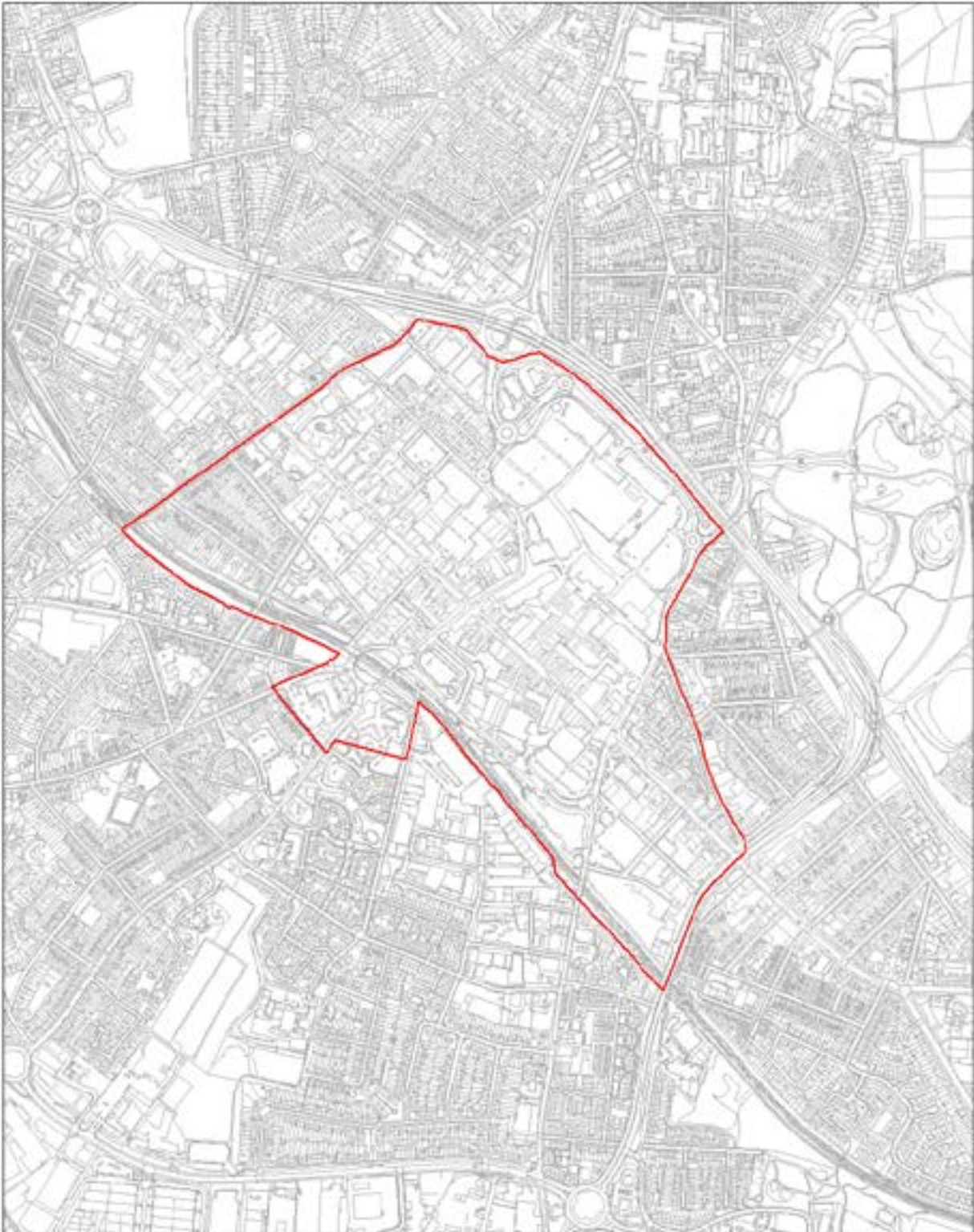


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West Bromwich Town Centre

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