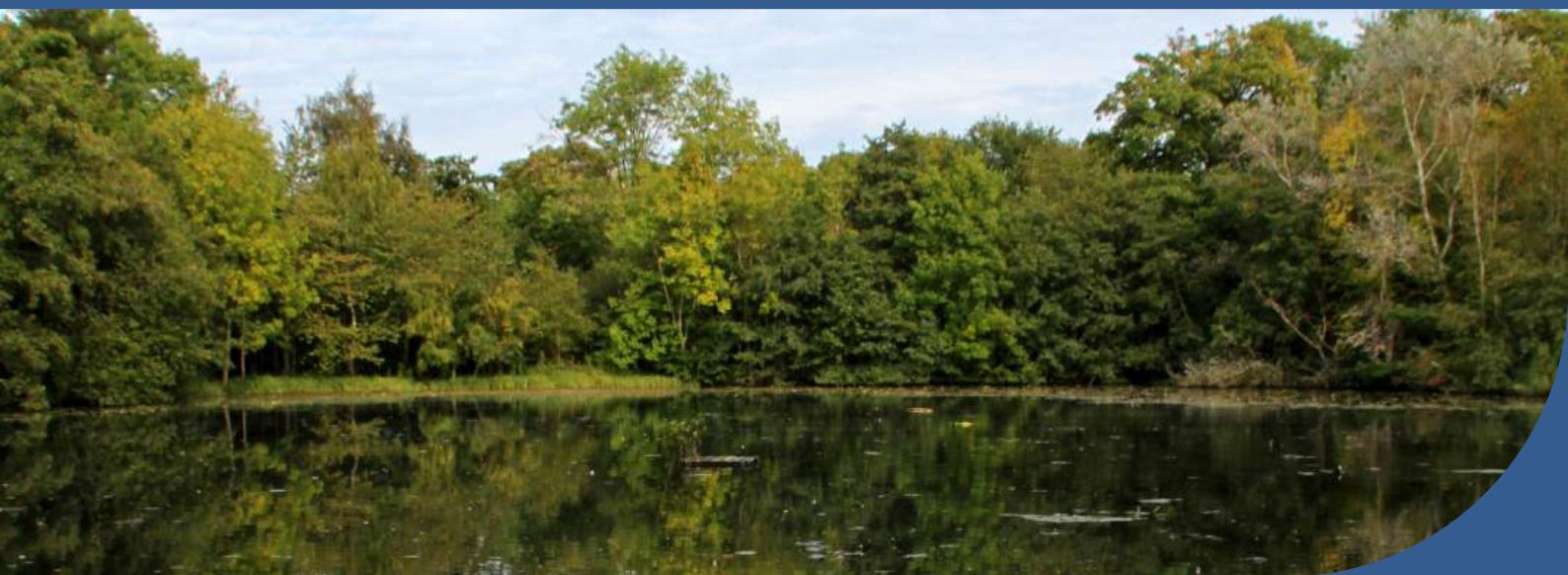


Sandwell Local Plan 2024-2041 Proposed Main Modifications

Habitats Regulations Assessment of the Main Modifications

January 2026





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Document Control Box	
Client	Sandwell Metropolitan Borough Council
Report title	Habitats Regulations Assessment of the Sandwell Local Plan Main Modifications
File name	LC-1470_Sandwell_Main Modifications_HRA_8_150126SC.docx
Status	Final
Date	January 2026
Author	SC
Reviewed	LB
Approved	ND

Front cover: Rowley Hills (Lepus Consulting)

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Acronyms and abbreviations

AM	Additional Modification
HRA	Habitats Regulations Assessment
LPA	Local Planning Authority
LSE	Likely Significant Effects
MIQs	Matters, Issues and Questions
MM	Main Modification
MMUH	Midland Metropolitan University Hospital
PM	Policies Map Modification
SAC	Special Area of Conservation
SLP	Sandwell Local Plan
SMBC	Sandwell Metropolitan Borough Council
SoCG	Statement of Common Ground
SPA	Special Protection Area
WCS	Water Cycle Study

Executive summary

Purpose of this report

E1 This Habitats Regulations Assessment (HRA) report appraises the Schedules of Proposed Main Modifications to the Sandwell Local Plan (SLP) (December 2025) that have been prepared by Sandwell Metropolitan Borough Council (SMBC). The Main Modifications to the SLP, which will cover the period from 2024 to 2041, have been put forward by SMBC in response to the Local Plan Inspector's Matters, Issues and Questions (MIQs), notes and letters received throughout the examination process.

E2 A total of 105 Main Modifications to the SLP have been proposed, as well as 67 Additional Modifications and 15 Policies Map Modifications. Details of the Council's proposed schedule of Main Modifications are set out in **Appendix A** of this report.

Assessment findings

E3 Each proposed modification has been evaluated in **Appendix A** to understand if it will result in new likely significant effects (LSEs) on European sites, and whether the conclusions of the HRA process for the submitted SLP remain valid in light of these modifications. The methodology for the assessment process is the same as that used at all earlier stages in the HRA of the submitted SLP.

E4 The assessment indicates that the majority of the proposed modifications do not result in a change to the outcomes of the HRA prepared at the submission stage of plan-making. However, 23 policies represent circumstances where it cannot be conclusively ruled out, at this stage, that LSEs on European sites may arise. These policies have therefore been identified for further consideration within the HRA screening process, in accordance with the established assessment methodology.

E5 Whilst the modifications introduce an uplift in housing and employment numbers in the SLP through the following six policies, the overall magnitude does not change the assessment conclusions that were reached in the HRA at submission.

- SDS1: Spatial Strategy for Sandwell
- SDS3: Regeneration in Sandwell
- SDS4: Towns and Local Areas
- SHO1: Delivering Sustainable Housing Growth
- SEC1: Providing for Economic Growth and Jobs
- SWB2: Development in West Bromwich

E6 Given the strategic nature of the traffic, air quality and water quality modelling that was drawn upon to inform the Submission HRA AA, and the continued inclusion of protective water policies within the SLP and the higher level regulatory framework, it is considered unlikely that the proposed uplift triggered by modifications to these policies would change the overall conclusions made in the Submission HRA.

E7 MM74 (Hot Food Takeaways) combines two policies together, Policies SDM6 and SDM7. The modified policy does not alter the scale, nature, or location of development in a manner that would result in adverse effects on the integrity of any European site.

E8 The following 16 policies relate to sites evaluated in the HRA process and reported upon in the Submission HRA. Although there are some increases and decreases in the housing numbers, it is considered that the findings of the Submission HRA (2024) remain valid and modifications to these policies do not alter the scale, nature, or location of development in a manner that would result in adverse effects on the integrity of any European site.

- MM79: Policy SSH1 – Edwin Richards Quarry
- MM80: Policy SSH2 – Friar Park
- MM81: Policy SSH3 – Rattlechain and Land between Addington Way and River Tame
- MM82: Policy SSH4 – North Smethwick Canalside
- MM84: Policy SSH5 – Abberley Street
- MM85: Policy SSH6 – Cape Arm Cranford Street:
- MM86: Policy SSH7 – Cranford Street / Heath Street / Canal
- MM87: Policy SSH8 – Grove Lane / Cranford Street / London Street
- MM88: Policy SSH9 – Grove Street / MMUH
- MM89: Policy SSH10 – Moilliett Street Park
- MM91: Policy SSM1 – Lion Farm
- MM93: Policy SSM2 – Cultural Quarter
- MM94: Policy SSM3 – George Street Living
- MM95: Policy SSM4 – Queens Square
- MM96: Policy SSM5 – West Bromwich Central
- MM98: Policy SSE1 – Coneygree Business Park (Open Land)

Conclusions

E9 This assessment concludes that the modifications evaluated in this report (including **Appendix A**) will not alter the scale, nature, or location of development in a manner that would result in adverse effects on the integrity of any European site.

E10 It can therefore be concluded that the proposed modifications to the SLP will not give rise to adverse impacts on the site integrity of any European site, either alone or in combination with other plans or projects.

1 Introduction

1.1 Context

1.1.1 Lepus Consulting Ltd (Lepus) has prepared this Habitats Regulations Assessment (HRA) Report of the proposed Main Modifications to the Sandwell Local Plan (2024-2041) as submitted¹, on behalf of Sandwell Metropolitan Borough Council (SMBC).

1.1.2 This HRA Report has appraised the Main Modifications as presented within the 'Sandwell Local Plan Examination in Public Main Modifications' (December 2025). This HRA has been prepared in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended)², known as the Habitats Regulations.

1.2 Purpose of this report

1.2.1 This Main Modifications HRA Report forms part of the series of HRA reports that have been prepared to document the iterative HRA process and supplements the earlier HRA outputs delivered alongside preparation of the Sandwell Local Plan (2024-2041) as listed below.

- Issues and Options Consultation. Preliminary HRA Report (Regulation 18)³
- Draft Sandwell Local Plan Regulation 18 Habitats Regulations Assessment (Regulation 18)⁴
- Sandwell Habitats Regulations Assessment of the Sandwell Local Plan (Regulation 19)⁵
- Submission Habitats Regulations Assessment (Regulation 22)⁶

1.2.2 This report focuses on whether the proposed Main Modifications to the Sandwell Local Plan (SLP), put forward by the SMBC in response to the Inspector's Matters, Issues and Questions (MIQs), notes and letters received throughout the examination process, will result in new Likely Significant Effects (LSEs) upon any European Site, and whether the conclusions of the HRA report listed in **paragraph 1.2.1** remain valid in light of these modifications. In the context of this report, European sites include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites⁷.

1.2.3 This report does not contain all information normally presented in an HRA report and should therefore be read in conjunction with the HRA reports listed in **paragraph 1.2.1**.

¹ Sandwell Metropolitan Borough Council (2024) Sandwell Local Plan 2024-2041. Submission Version. Available at: <https://www.sandwell.gov.uk/downloads/file/3531/sandwell-local-plan-reg-19-submission-version> [Date accessed: 04/11/25]

² The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date accessed: 19/11/25]

³ Lepus Consulting (January 2023) Habitats Regulations Assessment of the Sandwell Local Plan. Issues and Options Consultation. Preliminary HRA Report.

⁴ Lepus Consulting (October 2023) Draft Sandwell Local Plan Regulation 18: Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/1547/sandwell-habitats-regulations-assessment-reg-18-october-2023-> [Date accessed: 23/12/25]

⁵ Lepus Consulting (September 2024) Habitats Regulations Assessment of the Sandwell Local Plan – Regulation 19. Available at: <https://www.sandwell.gov.uk/downloads/file/3204/sandwell-habitats-regulations-assessment-reg-19-september-2024-> [Date accessed: 23/12/25]

⁶ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

⁷ Wetlands of international importance (both listed and proposed).

1.2.4 All Main Modifications have been evaluated through the HRA process for new LSEs and / or to determine whether the modification would result in a change to the findings of the HRA reports prepared in support of the plan-making process (listed in **paragraph 1.2.1**). This evaluation is presented in **Appendix A**.

1.3 Submission and Examination of the Sandwell Local Plan

1.3.1 The Sandwell Local Plan (2024-2041) was submitted to the Secretary of State for public examination on 11th December 2024⁸.

1.3.2 The Local Plan Week 1 examination hearing sessions were held between 15th and 18th July 2025, and the Week 2 and 3 hearings between 23rd September and 3rd October 2025.

1.3.3 The Inspector wrote to the Council on 9th October 2025 regarding the modifications that will need to be made to make the Local Plan sound⁹. The Council has responded to these matters and updated the SLP as set out in the Schedule of Proposed Main Modifications to the Sandwell Local Plan (December 2025). This report provides an HRA of these proposed modifications.

1.3.4 The Schedules of proposed Main, Additional and Policies Map Modifications are listed in **Appendix A**.

1.4 Structure of this report

1.4.1 This report is structured as follows:

- **Chapter 1:** Introduction;
- **Chapter 2:** The SLP and HRA process;
- **Chapter 3:** Summary methodology;
- **Chapter 4:** Evaluation of the Main Modifications;
- **Chapter 5:** Conclusions; and
- **Appendix A:** Screening of the Schedules of Main, Additional and Policies Map Modifications.

⁸ Sandwell Metropolitan Borough Council (2025) Sandwell Local Plan Examination. Available at: <https://www.sandwell.gov.uk/planning-planning-policy/sandwell-local-plan-examination> [Date accessed: 04/11/25]

⁹ Jack, C. (2025) Post-Hearings Letter to Sandwell Metropolitan Borough Council, 09 October. Available at: <https://www.sandwell.gov.uk/downloads/file/4819/saed84-sandwell-inspector-s-post-hearing-advice-letter> [Date accessed: 04/11/25]

2 The SLP and HRA process

2.1 Introduction

2.1.1 HRA is an iterative process which feeds into the preparation of a local plan at all stages of plan-making. This Main Modifications HRA Report forms the latest stage of a series of reports that have been prepared to document the iterative HRA process. The following sections summarise the outputs of each stage of the HRA process.

2.2 Issues and Options Consultation Preliminary HRA Report (Regulation 18)

2.2.1 The Sandwell Local Plan Issues and Options Review¹⁰ was supported by an HRA, prepared in early 2023, which included a preliminary screening of issues and options and made recommendations to inform policy wording¹¹. The HRA identified LSEs associated with air quality, hydrology and functionally linked habitat at a number of European sites.

2.3 Draft Sandwell Local Plan Regulation 18 Habitats Regulations Assessment (Regulation 18)

2.3.1 In Autumn 2023, the Council sought views on the direction of the Draft SLP through a Regulation 18 consultation. An HRA was produced in support of the Draft SLP and provided a screening of allocations and policies for consultation. The consultation also set out further stages of HRA work and the HRA provided a preliminary AA¹². The Draft SLP HRA identified possible impacts at the following European sites:

- Cannock Extension Canal SAC – air quality and water quality/quantity LSEs;
- Ensor's Pool SAC – water quality/quantity LSE;
- Fens Pools SAC – air quality and water quality/quantity LSEs;
- Humber Estuary SAC – water quality/quantity LSE;
- Humber Estuary SPA – water quality/quantity LSE;
- Humber Estuary Ramsar – water quality/quantity LSE;
- River Mease SAC – water quality/quantity LSE;
- Severn Estuary SAC – water quality/quantity LSE;
- Severn Estuary SPA – water quality/quantity LSE; and,
- Severn Estuary Ramsar – water quality/quantity LSE.

2.3.2 Natural England was consulted on the Draft SLP HRA and welcomed the consideration of issues set out in the HRA report¹³.

¹⁰ SMBC (2023) Sandwell Local Plan Issues and Options Review Public Consultation 6th February – 20th March 2023. Available at: <https://www.sandwell.gov.uk/downloads/file/895/sandwell-local-plan-issues-and-options-main-document> [Date accessed 23/12/25].

¹¹ Lepus Consulting (January 2023) Habitats Regulations Assessment of the Sandwell Local Plan. Issues and Options Consultation. Preliminary HRA Report.

¹² Lepus Consulting (October 2023) Draft Sandwell Local Plan Regulation 18: Habitats Regulations Assessment.

¹³ Natural England (2023) Consultation: Sandwell Local Plan – Issues and Options. 20 March 2023. [Letter].

2.4 Sandwell Habitats Regulations Assessment of the Sandwell Local Plan (Regulation 19)

2.4.1 The Regulation 19 Publication Plan was supported by an HRA which provided an update to the HRA screening assessment and a full Appropriate Assessment.

2.4.2 The updated screening assessment identified a number of LSEs associated with the SLP. Taking no account of mitigation measures, the SLP was identified to have the potential to affect the following European sites:

- Cannock Extension Canal SAC
- Ensor's Pools SAC
- Fens Pool SAC
- Humber Estuary SAC
- Humber Estuary Ramsar
- River Mease SAC
- Severn Estuary SAC
- Severn Estuary Ramsar

2.4.3 The following policies (**Table 2.1**) were screened in for further assessment in the AA process. All other policies that formed the SLP were screened out as they were considered to have no LSE either alone or in-combination.

Table 2.1: Summary of screened in policies (Note: only policies screened into the HRA process at Regulation 19 have been included in the summary table below).

Policy Number	Policy Name
Policy SDS1	Spatial Strategy for Sandwell
Policy SDS3	Regeneration in Sandwell
Policy SDS4	Towns and Local Areas
Policy SHO1	Delivering Sustainable Housing Growth
Policy SHO2	Windfall Developments
Policy SHO9	Accommodations for Gypsies and Travellers and Travelling Showpeople
Policy SEC1	Providing for Economic Growth and Job Creation
Policy SWB2	Development in West Bromwich
Policy SWA3	Preferred Areas for New Waste Facilities

2.4.4 The HRA progressed to an AA. The AA include a consideration of air quality (Cannock Extension Canal SAC and Fens Pools SAC), water quality and water quantity impacts (Cannock Extension Canal SAC, Ensor's Pool SAC, Fens Pools SAC, Humber Estuary SAC and Ramsar, River Mease and Severn Estuary SAC and Ramsar)¹⁴. The Regulation 19 HRA concluded no adverse impacts on site integrity following consideration of mitigation at any European site either alone or in-combination.

¹⁴ Lepus Consulting (September 2024) Habitats Regulations Assessment of the Sandwell Local Plan – Regulation 19. Available at: <https://www.sandwell.gov.uk/downloads/file/3204/sandwell-habitats-regulations-assessment-reg-19-september-2024-> [Date accessed: 23/12/25]

2.4.5 Natural England provided a response to the Regulation 19 SLP consultation in December 2024¹⁵. In this response, Natural England recommended that air quality impacts at Cannock Chase SAC also be considered through the HRA AA and consideration be given to the outputs of a strategic joint commission of air quality work prepared in relation to air quality impacts at European sites.

2.5 Submission Habitats Regulations Assessment (Regulation 22)

2.5.1 The Submission HRA¹⁶ provided the outputs of an updated screening and AA process. The screening assessment was revisited to identify LSEs. There were no changes to the conclusion of the Regulation 19 HRA report (as detailed in **Tabel 2.1**).

2.5.2 The updated AA included an assessment of the air quality evidence collated to support an assessment of air quality impacts at European sites to inform local plan production for a number of Local Planning Authorities (LPAs) including Sandwell. This information was not available at the time of writing the Regulation 19 HRA. As part of the joint air quality commission, Natural England and all affected LPAs signed up to a Statement of Common Ground (SoCG) in relation to air quality impacts at European sites¹⁷. The Submission HRA was therefore prepared to ensure that all relevant information contained within the final joint commission air quality work and the SoCG were evaluated through an AA.

2.5.3 The Submission HRA provided an assessment of the ecological impacts of air pollution on Cannock Chase SAC, Cannock Extension Canal SAC and Fens Pools SAC. Air quality modelling information was used to evaluate effects on the nature and extent of qualifying features and in the context of the conservation objectives for each European site. The AA concluded no adverse impacts on the site integrity of any European site due to a change in air quality from the SLP either alone or in-combination.

2.5.4 The Submission HRA also provided an updated AA relating to the effects of development and policy proposals presented in the SLP upon water quality and water quantity. This assessment included a consideration of the impacts of water quality on functionally linked watercourses used by migratory species of fish which are part of the qualifying features of the Severn Estuary SAC and Ramsar and the Humber Estuary SAC and Ramsar designations. The AA drew on the high-level regulatory water quality and quantity protection frameworks and SLP requirements, habitat condition assessments and the outputs of water quality modelling undertaken through the 2024 Water Cycle Study¹⁸. This information was analysed in the context of the conservation objectives for each European site. The AA concluded no adverse impacts on the site integrity at any European site or qualifying species using functionally linked watercourses due to a change in water quality or quantity as a result of the SLP either alone or in-combination.

¹⁵ Natural England (2024) Amended Letter: Sandwell Local Plan Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. 11 December 2024. [Letter]

¹⁶ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

¹⁷ Statement of Common Ground between Cannock Chase District Council, City of Wolverhampton Council, Dudley Metropolitan Borough Council, East Staffordshire Borough Council, Lichfield District Council, Sandwell Metropolitan Borough Council, Stafford Borough Council, South Staffordshire District Council, Walsall Council and Natural England in relation to air quality. 4th December 2024.

¹⁸ JBA Consulting (2024) Sandwell Local Plan Water Cycle Study -Stage 2.

3 Methodology

3.1 Overview

3.1.1 This HRA report is part of a sequence of assessment phases which began in 2023 (see **Chapter 2**). It focuses on changes prepared by the SMBC which have been made in response to the findings issued by the planning inspector conducting the examination hearings (**Section 1.3**). Unless otherwise stated, all assessment findings reported in the Submission HRA (2024), remain the same.

3.1.2 HRA is a rigorous precautionary process centred around the conservation objectives of a European site's qualifying interests. It is intended to ensure that European sites are protected from impacts that could adversely affect their integrity. A step-by-step guide to the methodology followed for the HRA, as outlined in the DTA Handbook, is illustrated in **Figure 3.1**.

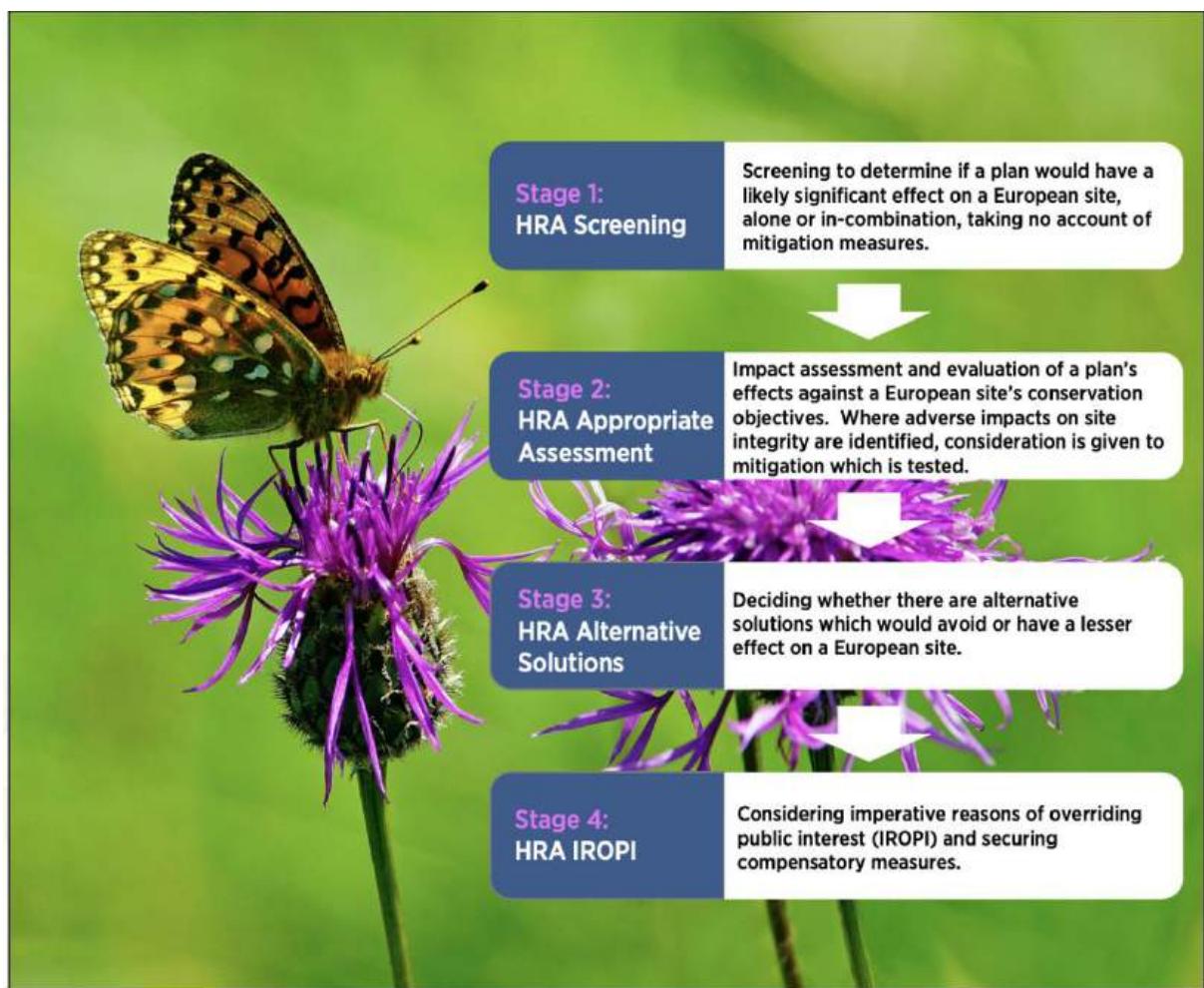


Figure 3.1: Stages in the Habitats Regulations Assessment process¹

3.1.3 Using the HRA methodology outlined in Chapter 4 of the 2022 HRA report, the Main Modifications (detailed in **Appendix A**) have been evaluated to determine whether they would result in a new LSE or trigger a change to the conclusions of the 2022 Regulation 19 HRA report (referred to as the 2022 HRA hereafter) (**Chapter 2**). The output of this assessment is reported in **Chapter 4**.

4 Evaluation of the Main Modifications

4.1 Introduction

4.1.1 All proposed Main Modifications to the SLP have been evaluated through the HRA process to determine whether they would result in a new LSE or trigger a change to the conclusions of the 2024 Submission HRA¹⁹. The findings of this evaluation are set out in **Appendix A**.

4.2 Main Modifications for consideration in HRA process

4.2.1 The majority of modifications relate to clarification of points, updates to reflect the latest position, correction of errors or addition of explanatory text. Other changes amend policy wording in ways that do not introduce new development and relate to wording that will have no adverse implications for European sites, or otherwise alter the conclusions of the 2024 Submission HRA.

4.2.2 All allocations (employment, residential and gypsy and traveller pitches) were assessed in the Submission HRA (2024) which concluded that the SLP would have no adverse impact on site integrity either alone or in-combination at any European site. Whilst the main modifications do not introduce any new allocations, a number of the modifications introduce a change to housing and employment numbers to reflect additions to sites with planning permission (i.e. committed development), changes to the windfall allowance and the removal of discounting made in the Submission SLP.

4.2.3 This Main Modifications HRA report has therefore evaluated all policy modifications as presented in **Appendix A**. Of these modifications, 23 have been identified as requiring further evaluation.

4.2.4 All policies were assessed through the Submission HRA. The modifications set out in **Appendix A**, with the exception of the 23 policies identified in **paragraphs 4.2.5 to 4.2.6**, do not alter the findings or conclusions of the Submission HRA. Consequently, no further assessment, beyond that reported upon in **Appendix A**, is required for the remaining modifications.

4.2.5 Modifications to the following six policies have resulted in an uplift to housing and employment numbers:

- SDS1: Spatial Strategy for Sandwell
- SDS3: Regeneration in Sandwell
- SDS4: Towns and Local Areas
- SHO1: Delivering Sustainable Housing Growth
- SEC1: Providing for Economic Growth and Jobs
- SWB2: Development in West Bromwich

4.2.6 In addition, the modifications combine two policies and also introduce 16 new policies as listed below:

- MM74: Combined Policy SDM6 and SDM7 – Hot Food Takeaways
- MM79: Policy SSH1 – Edwin Richards Quarry
- MM80: Policy SSH2 – Friar Park

¹⁹ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

- MM81: Policy SSH3 – Rattlechain and Land between Addington Way and River Tame
- MM82: Policy SSH4 – North Smethwick Canalside
- MM84: Policy SSH5 – Abberley Street
- MM85: Policy SSH6 – Cape Arm Cranford Street
- MM86: Policy SSH7 – Cranford Street / Heath Street / Canal
- MM87: Policy SSH8 – Grove Lane / Cranford Street / London Street
- MM88: Policy SSH9 – Grove Street / MMUH
- MM89: Policy SSH10 – Moilliett Street Park
- MM91: Policy SSM1 – Lion Farm
- MM93: Policy SSM2 – Cultural Quarter
- MM94: Policy SSM3 – George Street Living
- MM95: Policy SSM4 – Queens Square
- MM96: Policy SSM5 – West Bromwich Central
- MM98: Policy SSE1 – Coneygree Business Park (Open Land)

4.2.7 Each Modification identified for further consideration in the HRA process has been assessed below in terms of its implications in the context of the findings of the Submission HRA.

4.3 MM5: SDS1 – Spatial Strategy for Sandwell

Policy SDS1 – Spatial Strategy for Sandwell

1. To support the attainment of the Sandwell SLP Vision, drive sustainable and strategic economic and housing growth and meet local aspirations, Sandwell, working with local communities, partners and key stakeholders, will make sure that decisions on planning proposals:
 - a. deliver at least 40,434 **11,901** net new homes **across the plan period** and create sustainable mixed communities including a range and choice of new homes supported by adequate infrastructure;
 - b. **seek to meet existing Gypsy, Travellers and Travelling Showpeople needs as far as possible.**
 - c. maintain the ongoing provision of around 1,221ha of allocated employment land **across the plan period** (of which 29ha is currently vacant) (**Policies SEC1 – SEC3**);
 - d. ensure that sufficient physical, social, **emergency services, utility** and environmental infrastructure is delivered to meet identified requirements;
 - e. support improvements to the health and wellbeing of Sandwell's communities by requiring new development to address the following:
 - a. increased access to green spaces;
 - b. active and passive recreation;
 - c. active travel;
 - d. improved and accessible education and healthcare infrastructure;
 - e. opportunities for people to make healthier choices.
 - f. minimise and mitigate the likely effects of climate change, recognising the multifunctional benefits that open spaces, landscaping, trees, nature conservation habitats and both green and blue infrastructure can deliver in doing so;
 - g. create new public open spaces to serve new housing developments;
 - h. protect and improve parks, woodland and tree planting, open spaces, landscapes and habitats across the borough;
 - i. protect the openness, integrity and function of Sandwell's designated green belt by resisting inappropriate development in it **except in circumstances as set out in national guidance**;
 - j. protect habitats and areas of ecological value **and support nature recovery**;
 - k. conserve the significance of the historic environment, particularly in relation to **designated** heritage assets and their settings, and protect areas with geological and landscape value;
 - l. promote the use of zero- and low-carbon designs, building techniques, materials and technologies in all new development.
2. The SLP seeks to ensure this growth is sustainable by requiring the following issues are addressed in planning proposals:

Policy SDS1 – Spatial Strategy for Sandwell

- a. delivering as much new development as possible on previously developed land and sites in the urban area;
- b. **allocating ensuring housing is delivered** in locations with the highest levels of sustainable transport access to residential services (e.g. retail provision, schools, healthcare facilities, fresh food, employment etc.), **such as near railway stations, metro stops and public transport hubs, and making effective use of land through the application of minimum densities (Policy SHO3):**
- c. regenerating existing housing and employment areas and help them deliver:
 - a. cleaner, more energy-efficient and more intensive areas of growth; and
 - b. improving the environmental, climate change, accessibility and socio-economic capacity of existing residential and employment areas;
- d. **allocating ensuring new employment land is delivered in locations** where sustainable access and good public transport links are available;
- e. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites;
- f. taking advantage of existing and improved infrastructure capacity to maximise development on new sites;
- g. ensuring all new development is designed to encourage sustainable travel and minimise detrimental impacts on the transport network;
- h. **ensuring all new development is designed to minimise the opportunities for crime and antisocial behaviour to occur and to optimise public and individual safety;**
- i. supporting and enhancing the sustainability of existing communities through the focussing of growth and regeneration into West Bromwich and other town centres and regeneration areas (Policy SDS3);
- j. protecting and enhancing the quality of existing towns and local areas and re-balancing the housing stock by delivering homes supported by jobs and local services.

3. Appendices B and C **Chapters 16 and 17** show how the housing and employment land ambitions for Sandwell will be met. **They include strategic site policies for housing and employment and mixed use, and non-strategic allocations.** Those development needs that cannot be accommodated within the borough will be exported to sustainable locations in neighbouring local authority areas, following consultation.

- 4.3.1 Modifications to Policy SDS1 introduce an uplift to housing numbers set out in the SLP to reflect additions to sites with planning permission (i.e. committed development), changes to the windfall allowance and the removal of discounting made in the Submission SLP. Modifications have resulted in a change in housing numbers from at least 10,434 to at least 11,901 net new homes across the plan period.
- 4.3.2 The Submission HRA provided an AA of air quality impacts and water quality / quantity impacts.
- 4.3.3 The air quality AA focused on assessing more precisely the ecological impacts of air pollution due to the SLP, in combination with other plans and projects, upon the qualifying features of Cannock Chase SAC, Cannock Extension Canal SAC and Fens Pools SAC. This assessment drew on traffic and air quality modelling that was commissioned by nine Local Planning Authorities to support Local Plan preparation, including Sandwell, Dudley, Wolverhampton, East Staffordshire, South Staffordshire, Stafford, Litchfield, Cannock Chase and Walsall Councils. These LPAs worked together to prepare a joint strategic air pollution evidence base to support Local Plan production in their respective local authority areas. This piece of work is referred to hereafter as the 'joint commission'.

4.3.4 Traffic and air quality modelling prepared as part of this joint commission was informed by projected housing numbers across each of the nine LPA areas. Traffic and air quality modelling outputs are high level and strategic in their nature. Air quality modelling outputs were interpreted in the context of the conservation objectives of each of the three European sites to allow a habitat specific assessment of potential impacts associated with emissions. The Submission HRA AA concluded no adverse impacts on the site integrity of any European site due to a change in air quality from the SLP either alone or in-combination.

4.3.5 Whilst the main modifications introduce an uplift in housing numbers, the overall quantum of development across the nine LPA administrative areas remains broadly similar in nature. Given the strategic nature of the traffic and air quality modelling it is considered unlikely that the proposed uplift triggered by modifications to Policy SDS1 would change the overall conclusions of the air quality AA presented in the Submission HRA.

4.3.6 Water quality and water quantity impacts were considered in the Submission HRA upon both European sites and associated functionally linked watercourses. The AA drew on the outputs of water quality modelling undertaken through a Water Cycle Study (WCS). Based on water quality modelling outputs and consideration of the high-level regulatory water quality and quantity protective framework and SLP policy requirements in relation to the water environment, the Submission HRA concluded no adverse impacts on the site integrity of any European site or qualifying species using functionally linked watercourses due to a change in water quality or quantity as a result of the SLP either alone or in-combination.

4.3.7 The high-level regulatory framework and SLP policies which relate to the protection of the water environment remain unchanged by the proposed modifications. The water quality modelling was high level and strategic in its nature. It is therefore considered unlikely that the proposed uplift triggered by modifications to Policy SDS1 would change the overall outputs of the WCS and therefore the conclusions made in the Submission HRA remain unchanged.

4.3.8 The potential implications of a change in air or water quality / quantity for European sites, will be a priority for the upcoming West Midlands Strategic Development Strategy and the SLP review. Future traffic, air quality and water quality modelling will utilise updated plan numbers.

4.4 MM7: SDS3 – Regeneration in Sandwell

Policy SDS3 – Regeneration in Sandwell

1. The Regeneration Areas identified on the Policies Map and the strategic centre of West Bromwich will be the focus for new development, regeneration, and public and private investment in the borough.
2. Proposals will be subject to relevant development plan policies, and the form and location of regeneration will be guided by design codes, masterplans and /or design briefs, which will be prepared by the Council in partnership with developers, promoters and other stakeholders.
3. West Bromwich
 - a. West Bromwich is a major destination for residents and visitors and will benefit from a step change in the quality of its public realm, including new green links, squares and parks.
 - b. **As set out in the West Bromwich Masterplan** Residential and employment growth will be sought at a transformational level to help create a vibrant and sustainable town centre with a diverse range of uses, including commercial, educational, cultural, recreational, leisure and community facilities.
 - c. Sustainable and active travel modes will be the default choice for accessing and moving within the town.
4. Carter's Green
 - a. Carter's Green will accommodate new residential development on under-used land. The scale of growth will be complementary and subordinate to the transformation of West Bromwich.
5. Dudley Port

Policy SDS3 – Regeneration in Sandwell

- a. The regeneration of Dudley Port will include employment development and the construction of new residential communities developed along Garden City principles.
- b. A new public transport hub will be developed around the interchange of the Midland Metro Extension and Dudley Port railway station.

6. Smethwick

- a. The historic Smethwick to Birmingham canal corridor will accommodate accessible active travel routes and new green neighbourhoods on re-purposed employment land allocated for residential uses on the SLP Policies Plan-Map.
- b. Regeneration at Grove Lane will be focussed on the area around the new Midland Metropolitan University Hospital, and will include the development of new homes, employment, and education facilities²⁰.
- c. Industrial land at Rolfe Street will be regenerated to create a well-designed residential community that respects the heritage of the area and its canal-side setting²¹.

7. Wednesbury to Tipton Metro Corridor

- a. Proposals for the regeneration of industrial land along the corridor of the Midland Metro Extension will be supported, including new employment development on vacant and underdeveloped land.
- b. Retail, residential, and mixed-use development will be encouraged in Wednesbury Town Centre²², Great Bridge Town Centre and Owen Street District Centre in line with their position within the hierarchy of centres and the requirements of the relevant policies in the Centres chapter of the SLP.

Development within Regeneration Areas

8. Excluding West Bromwich (Policy SWB2) the regeneration areas will provide:

- a. the principal locations for strategic employment areas;
- b. high-quality employment areas to support the long-term success of Sandwell's economy (Policy SEC2);
- c. the main clusters of local employment land providing for local jobs (Policies SEC3 and SEC4);
- d. the principal locations for new industrial and logistics development - providing at least 584 ~~459~~ha of employment land, designated as SEC1, 2 and 3 sites on the SLP Policies Map, to meet growth needs;
- e. a minimum of 2,134 3,037 new homes (~~discounted~~) of mixed type and tenure in sustainable locations well-supported by community services and local shops, set within and linked by comprehensive networks of green infrastructure with cycling and pedestrian routes;
- f. investment in existing, new, and improved transportation infrastructure with a focus on public transport routes and hubs, to maximise their use by residents, workers and visitors;
- g. strong links with surrounding communities and the wider network of centres; and
- h. enhanced green infrastructure, including enhancements to nature conservation sites and wildlife habitats, new and improved green spaces, and new urban greening features (Policy SDS8).

4.4.1 Modifications to Policy SDS3 introduce a reduction in employment numbers but an uplift in housing numbers set out in the SLP to reflect additions to sites with planning permission (i.e. committed development), changes to the windfall allowance and the removal of discounting made in the Submission SLP. Modifications have resulted in a reduction in employment numbers from at least 584ha, to at least 495ha of employment land across the plan period in regeneration areas. Modifications have also resulted in an uplift in housing numbers from at least 2,134, to at least 3,037 homes in regeneration areas in Sandwell.

4.4.2 The conclusions reported in **Section 4.3** for Policy SDS1 in relation to implications upon air quality, water quality and water quantity at European sites will be the same for MM7. In summary it considered unlikely that the proposed changes triggered by modifications to Policy SDS3 would change the overall outputs and conclusions of the Submission HRA.

²⁰ Please also see Appendix DB

²¹ Please also see Appendix DB

²² Please also see Appendix DB and <https://regeneratingsandwell.co.uk/heritage-regeneration-1/wednesbury-high-street-heritage-action-zone>

4.5 MM8: SDS4 – Towns and Local Areas

Policy SDS4 – Towns and Local Areas

1. Towns and local communities outside West Bromwich and the regeneration areas identified in Figure 3 will provide:
 - a. **a minimum of 474-6,503** new homes delivered through:
 - i. the allocation of previously identified housing sites or ones submitted as part of **a the local plan Call for Sites exercise**²³;
 - ii. the repurposing of a small number of brownfield employment sites and other previously developed and surplus land for new housing;
 - iii. **small-scale residential development on windfall sites submitted through the planning application process opportunities in highly sustainable locations;**
 - iv. housing renewal areas;
 - v. estimating the capacity of vacant retail floorspace;
 - b. Clusters of local employment land that provide land and premises to meet localised business needs;
 - c. Approximately **637-726**ha of identified employment land, **designated as SEC1, 2 and 3 sites on the SLP Policies Map**, to meet employment needs;
 - d. An integrated and (where possible) continuous network of green infrastructure and walking and cycling routes, as well as a network of centres, health, leisure, sports, recreation and community facilities; and
 - e. Improved access and infrastructure links between regeneration projects, local areas and West Bromwich, to allow related positive outcomes to be integrated into existing and newer communities.

4.5.1 Modifications to Policy SDS4 introduce an uplift in housing and employment numbers set out in the SLP to include a correction to the housing number previously stated, reflect additions to sites with planning permission (i.e. committed development), changes to the windfall allowance and the removal of discounting made in the Submission SLP. Modifications have resulted in an uplift in housing numbers to 6,503 new homes and 726ha of identified employment land in towns and local areas in Sandwell.

4.5.2 The conclusions reported in **Section 4.3** for Policy SDS1 in relation to implications upon air quality, water quality and water quantity at European sites will be the same for MM8. In summary it considered unlikely that the proposed changes triggered by modifications to Policy SDS4 would change the overall outputs and conclusions of the Submission HRA.

4.6 MM35: SHO1 – Delivering Sustainable Housing Growth

Policy SHO1 – Delivering Sustainable Housing Growth

1. Sufficient land will be provided to deliver at least 40,434 **11,901** net new homes over the period 2024 - 2041. **As set out in the NPPF (para 76b), Sandwell Council is seeking to confirm through the SLP the existence of a 5-year housing land supply from the year of adoption (2026). For this purpose, a 20% buffer has been applied to housing supply, in line with the most recent Housing Delivery Test results (2023).**
2. The key sources of housing land supply are summarised in Table 57, **which also provides an indicative number of homes to be delivered in the following timeframes: 2024–2029, 2029–2034, 2034–2039 and 2039–2044. Strategic Housing allocations are set out in Appendix B-Chapter 16 and Non-Strategic housing allocations are set out in Chapter 17.**

Table 5-7 – Housing Land Supply – sources

²³ Submission of a site under the Call for Sites procedure does not indicate / guarantee its suitability for allocation.

Policy SH01 – Delivering Sustainable Housing Growth

Source of Supply	Type of Supply	2024-2029	2029-2034	2034-2039	2039-2041	Total
Current Supply	Site under construction	883	6	0	0	889
	Sites with Planning Permissions or Prior Approval [▲]	787	97	0	0	884
	Sites with Other Commitments (as set out in 2024 SHLAA) [◆]	24	17	0	0	41
Allocated	Occupied Employment Land ⁺	224	916	770	333	2243
	Other Non-Occupied Employment Land [◆]	158	1349	797	0	2304
	Sites with Planning Permission [▲]	1142	288	95	95	1620
	Sites Under Construction	76	0	0	0	76
Total Identified Sites		3293	2673	1662	428	8057
Total Windfall Allowance	Small sites (<10 homes / 0.25ha)	0	875	875	350	2100
Additional floorspace in centres	West Bromwich	0	5	0	0	5
	Town Centres	0	72	0	0	72
	District and Local Centres	0	95	0	0	95
Total additional floorspace in centres		0	172	0	0	172
Additional supply in Wednesbury Master Plan [◆]		0	105	0	0	105
Total Supply		3293	3825	2537	778	10434
Gypsy and Traveller pitches						
▲ Discounted by 5% ◆ Discounted by 10% + Discounted by 15%						

Policy SH01 – Delivering Sustainable Housing Growth

Source of Supply	Type of Supply	2024-2041
Current Supply	Site under construction	566
	Sites with Planning Permission or Prior Approval	929
	Site with Other Commitments (as set out in 2024 SHLAA)	70
Allocated	Sites without planning permission	6237
	Sites with Planning Permission	1328
	Sites under construction	322
Total Identified Sites		9452
Total Windfall Allowance	Small sites (<10 homes / 0.25ha) (2028-2041)	1547
Total Identified Sites and windfall allowance		10,999
Additional floorspace in centres	West Bromwich	5
	Town Centres	70
	District and Local Centres	95
Total additional floorspace in centres		170
Additional supply in Wednesbury Master Plan		117
Total Supply		11,286
Net completions		615
Total supply and net completions		11,901

3. Most of the requirement will be met through sites with existing planning permission and sites allocated for housing by this Plan. Additional housing supply will also be secured on windfall sites throughout the urban area. The estimated net effect of housing renewal up to 2041 will be reviewed annually and used in the calculation of housing land supply.
4. The development of sites for housing should ~~demonstrate be delivered through~~ a comprehensive approach, ~~making best use of available land and infrastructure and not prejudicing neighbouring uses.~~ Incremental development of an allocated site will only be allowed where it would not prejudice ~~the remaining parts of the site coming forward for development or the delivery of infrastructure the~~ achievement of high quality design across the wider site. Masterplans and other planning documents²⁴ will be produced, where appropriate, to provide detailed guidance on the development of allocations.
5. **All new developments should be supported by the necessary on and off-site infrastructure to serve its needs, mitigate its impacts on the environment and the local community, and ensure that it is sustainable and contributes to the proper planning of the wider area.**
6. Ancillary uses appropriate for residential areas, such as health facilities, community facilities and local shops, may be acceptable where there is a gap in service provision and where they can be integrated successfully into the residential environment. ~~Other uses will not be acceptable on these sites.~~

Modifications to Policy SH01 introduce an uplift to housing numbers set out in the SLP to reflect additions to sites with planning permission (i.e. committed development), changes to the windfall allowance and the removal of discounting made in the Submission SLP. Modifications have resulted in a change in housing numbers from at least 10,434 to at least 11,901 net new homes across the plan period.

²⁴ E.g., design codes, development frameworks and supplementary plans

4.6.1 The conclusions reported in **Section 4.3** for Policy SDS1 in relation to implications upon air quality, water quality and water quantity at European sites will be the same for MM35. In summary it considered unlikely that the proposed changes triggered by modifications to Policy SH01 would change the overall outputs and conclusions of the Submission HRA.

4.7 MM45: SEC1 – Providing for Economic Growth and Jobs

Policy SEC1 – Providing for Economic Growth and Jobs

1. The Sandwell Local Plan will seek to maintain the existing provision of around 1,221 hectares of employment land²⁵ across the borough.
2. The borough is subject to a demand for 211 **229.5** hectares of new employment land (based on the past trends forecast of 185 **203.5** hectares and accounting for the loss of employment land of 26 hectares to non-employment uses), between 2020 and 2041. This will be delivered through:
 - a. The development of employment development sites allocated in the Plan, equal to 42 **44.5** hectares (this figure includes past completions since 2020).
 - b. Additional land will be brought forward through the redevelopment, intensification, conversion and enhancement of existing employment sites allocated under Policies SEC2, SEC3 and SEC4.
 - c. Through the Duty to Co-operate process: the development of employment sites outside the borough (Black Country FEMA and those local authorities with an evidenced functional economic link to Sandwell).
3. The Plan will deliver a portfolio of **employment development** sites of various sizes and quality to meet a range of business needs. This land is **The employment development sites**, in addition to those sites currently occupied for employment **uses** purposes **under Policies SEC2, SEC3 and SEC4**. These sites will be safeguarded for **industrial employment uses** **uses under Use Classes E(g)(ii), E(g)(iii), B2, and B8**.
4. Within the existing employment areas subject to Policies SEC2, SEC3 and SEC4, the Council will support, with public intervention as necessary, the regeneration and renewal of such areas, including their environmental enhancement, **the protection and enhancement of heritage significance where it occurs** and **the incorporation of sustainable measures to mitigate climate change impacts**. Industrial developments will need to demonstrate how they have been designed to maximise resistance and resilience to climate change, as set out in Policy SDS2.
5. To enable Sandwell's employment areas to remain competitive and fit-for-purpose in the long term, and to aid in the economic recovery and rejuvenation of the borough's industrial economy, new and resident companies should be encouraged to adopt a circular economy approach and related infrastructure²⁶.

4.7.1 Modifications to Policy SEC1 introduce an uplift to employment numbers set out in the SLP to reflect additions to sites with planning permission (i.e. committed development), changes to the windfall allowance and the removal of discounting made in the Submission SLP. Modifications have resulted in a change in employment numbers from 42ha of employment development to 44.5ha across the plan period.

4.7.2 The conclusions reported in **Section 4.3** for Policy SDS1 in relation to implications upon air quality, water quality and water quantity at European sites will be the same for MM45. In summary it considered unlikely that the proposed changes triggered by modifications to Policy SEC1 would change the overall outputs and conclusions of the Submission HRA.

4.8 MM52: SWB2 – Development in West Bromwich

Policy SWB2 – Development in West Bromwich

1. It is a priority for West Bromwich to serve identified housing and employment growth aspirations (Policy SDS1, Policy SDS3). The diversification of West Bromwich to provide a re-purposed, well-balanced mix of appropriate uses will be supported (Policy SCE1), in particular:
 - a. Residential provision will be maximised, to increase and strengthen communities, with indicative housing capacity identified by the West Bromwich Masterplan **and West Bromwich Inset**, providing a minimum of 1,162 **1,536** new homes in the strategic centre by 2041.

²⁵ Of which 28ha is currently vacant, while 1,193ha is existing occupied employment land (2023)

²⁶ The circular economy is a model of production and consumption, which involves sharing, leasing, reusing, repairing, refurbishing and recycling existing materials and products as long as possible (<https://www.europarl.europa.eu/news/en/headlines/economy/20151201STO05603/circular-economy-definition-importance-and-benefits#:~:text=The%20circular%20economy%20is%20a,products%20as%20long%20as%20possible>).

Policy SWB2 – Development in West Bromwich

- b. Most new homes will be built at very high densities (Policy SHO3, Table 5) and as part of mixed-use developments where suitable, with additional residential use helping to attract investment and promoting the vitality of the centre.
- c. Complementary uses, particularly community, leisure, health and education use (Policy SDS5, Policy SDM9).

2. Large-scale proposals to serve wider catchment areas should be focussed on West Bromwich to maximise linked trips, promote the use of sustainable modes of transport and support regeneration.

Retail

- 3. Existing convenience and comparison retail provision will be protected and appropriate new development for these uses supported, to meet both local shopping needs and large-scale provision serving the wider catchment; this should be focused on re-purposing vacant floorspace and re-using existing sites within the centre in the first instance (Policy SCE1).

Leisure

- 4. Leisure uses, especially large-scale public and commercial facilities such as cinemas, hotels, and a wide range of high-quality family venues and activities, will be supported where they help to diversify the centre, encourage linked trips and enhance the evening economy and visitor experience (SDS5).

Office

- 5. Office provision will be supported, as West Bromwich is an important location for such employment. Future demand will be market-led; suitable sites are identified in the Masterplan.
- 6. Proposals in edge-of-centre and / or out-of-centre locations must meet the relevant requirements set out in Policy SCE6.

Sustainability

- 7. West Bromwich is a highly sustainable focus for service provision; it is a priority to ensure high quality public realm and standards of design are delivered and supported through environmental policies to deliver the aims and objectives in the Masterplan.

Accessibility

- 8. Proposals for commercial and business development that involve more than 500m² (gross) of floorspace within the primary shopping areas of the centre and well-linked edge-of-centre locations should provide a travel plan.

4.8.1 Modifications to Policy SWB2 introduce an uplift to housing numbers set out in the SLP to reflect additions to sites with planning permission (i.e. committed development), changes to the windfall allowance and the removal of discounting made in the Submission SLP. Modifications have resulted in a change from 1,162 to 1,536 new homes in the strategic centre of West Bromwich across the plan period.

4.8.2 The conclusions reported in **Section 4.3** for Policy SDS1 in relation to implications upon air quality, water quality and water quantity at European sites will be the same for MM52. In summary it considered unlikely that the proposed changes triggered by modifications to Policy SWB2 would change the overall outputs and conclusions of the Submission HRA.

4.9 MM74: Combined Policy SDM6 and SDM7 – Hot Food Takeaways

Policy SDM6 – Hot Food Takeaways

I: In principle considerations

Vitality and Viability

1. A percentage limit for the appropriate number of hot food takeaways in centres (strategic, town, district and local), including hot food takeaway permissions, and vacant units with a hot food takeaway as their lawful use is as follows:
 - a) in centres with 40 retail units or more – no more than 7% of frontages should be occupied by hot food takeaways
 - b) in centres with less than 40 retail units – no more than 12% of the frontages should be occupied by hot food takeaways.

Clustering of hot food takeaways in centres

2. No more than two hot food takeaway outlets should be located next to each other. Any application for a further hot food takeaway use that would exceed this limit will not be permitted.

Policy SDM6 – Hot Food Takeaways

3. Where two hot food takeaways are located next to each other, they should be separated from any new hot food takeaway unit by at least two non- hot food takeaway units.

Exclusions Zones

4. An exclusion zone will be implemented near to secondary schools and higher education establishments; no new hot food takeaway developments will be permitted where they are within 400 metres of a secondary school or college site (as measured in a straight line from the school entrance(s) used by pupils / students).

II: Detailed Matters

5. Where the above requirements have been satisfied and the Hot Food Takeaway is acceptable in principle the following additional measures to protect the amenity of surrounding residential occupiers will apply:

Amenity

- a. No new hot food takeaways will be permitted where they are directly adjacent to residential property at ground floor level. This does not apply to first / second floor flats above or diagonally above a proposed hot food takeaway.
- b. Where there is an existing residential unit above a proposed hot food takeaway, which is not connected with its operation, private residential amenity should not be prejudiced. Specific attention will need to be given to odour extraction, noise insulation, private accessibility and public convenience. Appropriate mitigation measures will include control over hours of opening hours.
- c. Where appropriate provisions cannot be included then such uses will not be supported, even within designated centres.

Local environmental issues

- d. All hot food takeaways will require appropriate fume extraction equipment to be installed, retained and maintained to reduce / remove potential nuisance from odours. Extraction systems should be effective in dispersing odours from hot food takeaways, whilst satisfying the council's design policies, especially in areas of historic character.
- e. Such systems should be insulated to a level sufficient to prevent any noise they make from creating adverse impacts for adjacent residents.

Disposal of waste products and litter

- f. Appropriate fat traps / interceptors must be installed on sinks and drains to prevent fat / oil from reaching the wastewater system, to avoid blockages and the subsequent flooding of property.
- g. Appropriate storage areas must be specified for food waste bins and packaging waste and be included in any new proposal.
- h. The bins to be provided must be a suitable size and should be stored in a location that will not cause a nuisance to neighbouring residential or commercial properties, including regarding odours and accessibility.
- i. Commercial bin stores must be contained within the site. Where this is not possible, secure storage structures should be provided, designed to prevent vermin infestation and reduce odours.

Management of Associated Impacts

Policy SDM6 – Hot Food Takeaways

- j. Proposals for new hot food takeaways will only be granted permission subject to planning conditions addressing matters such as (but not limited to):
 - a) opening hours;
 - b) parking restrictions;
 - c) highway safety;
 - d) where it is considered necessary, the installation of or contributions towards monitoring technology such as CCTV.
In some cases, approval may be limited to a personal permission and / or a temporary consent.
- k. In determining any planning applications for hot food takeaways, the Council will consider any issues concerning community safety, crime, and disorder and will, where necessary, seek advice from the police and other safety organisations.

4.9.1 MM74 combines two policies together, Policies SDM6 and SDM7. Policy SDM6 seeks to manage the distribution and operation of hot food takeaways cross the borough in order to promote healthier food environments, protect residential amenity, and ensure environmental standards. The policy aims to prevent the over-concentration of hot food takeaways by limiting their number within centres and introducing an exclusion zone around secondary school and educational establishments. This policy does not trigger a change or development that would result in an LSE and can therefore be screened out of the HRA process.

4.10 MM79: Policy SSH1 – Edwin Richards Quarry

Policy SSH1 – Edwin Richards Quarry

Location Edwin Richards Quarry, Portway Road, Rowley Regis

Gross Site Area (Ha) 52

Indicative Net Developable Area (Ha) 15

Indicative Capacity (and Completion Year) 628 homes (2027-2041) and an additional 150 homes post plan period

Policy SSH1 – Edwin Richards Quarry



SSH1 - Edwin Richards Quarry - Strategic Housing Allocation



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Site constraints

- The site comprises an extensive former dolerite quarry, part of which has been infilled with non-hazardous municipal, commercial and industrial waste. Landfill operations remain active, and are likely to continue in some form until their expiry date in February 2042.
- The northeastern part of the site is heavily covered with trees.
- The ground has been engineered, creating a series of man-made plateaus.
- A small proportion of the site along the southern boundary falls within a Site of Local Importance for Nature Conservation (SLINC). The southwestern corner is designated as a wildlife corridor and as strategic open space.

Successful development of the site will require:

- a) the preparation of a comprehensive masterplan in consultation with the Council, which responds to the Council's design code (Policy SDS5);
- b) The protection and enhancement of nature conservation sites (Policy SNE1);
- c) the waste disposal operational capacity of Edwin Richards Landfill to be maintained unless criteria in Policy SWA2 are met; and
- d) proposals for housing and other potentially sensitive uses to not conflict with waste disposal operations at Edwin Richards Landfill (Policy SWA2).

4.10.1 Policy SSH1 sets out the proposed site allocation at 'Edwin Richards Quarry'. This corresponds to Site SH37 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report²⁷). There are no changes to the area covered by this allocation. Although the site capacity has increased from 528 to 628 dwellings since the Submission stage, it is considered that this increase will not result in a change to the findings of the Submission HRA (2024), and that no new LSEs will be triggered as a result of the proposed modification.

4.11 MM80: Policy SSH2 – Friar Park

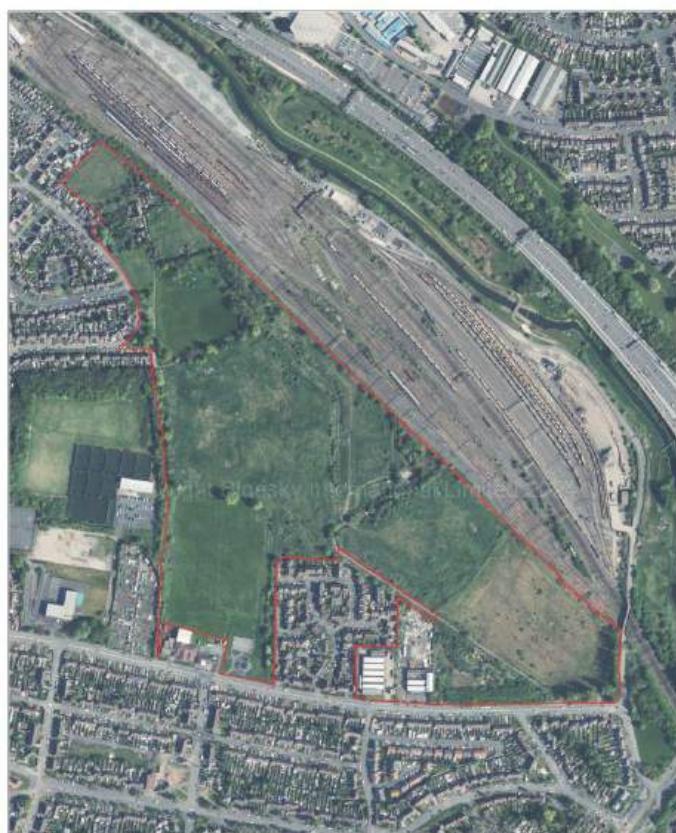
Policy SSH2 – Friar Park

Location Friar Park Urban Village, Friar Park Road, Wednesbury

Gross Site Area (Ha) 26.62

Indicative Net Developable Area (Ha) 15.75

Indicative Capacity (and Completion Year) 614 homes (2028-2036)



SSH2 - Friar Park - Strategic Housing Allocation



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Site constraints

- Five sports pitches (four youth 11v11 football pitches and one adult football pitch) are located on the site, all of which are recorded as lapsed in the Playing Pitch and Outdoor Sports Strategy (2022).

²⁷ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

Policy SSH2 – Friar Park

- Over half the site area is designated as a Site of Local Importance for Nature Conservation (SLINC).
- A small proportion of the northeastern corner of the sites lies within Flood Zone 2.
- Previous uses at the site mean that contaminated land and made ground is present, particularly in the area of the former sewage works.
- Bescot Local Distribution Centre (railway sidings) to the north and northwest of the site is a train stabling depot and aggregates logistics site.

Successful development of the site will require:

- a) general conformity with Friar Park Urban Village Masterplan (2023);
- b) that existing playing fields are not built on unless a mitigation package is agreed in accordance with NPPF paragraph 103 (Policy SHW5);
- c) an appropriate remediation strategy to be agreed and implemented with relevant stakeholders to address contamination issues (Policy SCO3); and
- d) damage to the designated SLINC to be minimised, and full mitigation secured to address any remaining impact on the SLINC (Policy SNE1).

4.11.1 Policy SSH2 sets out the proposed site allocation at 'Friar Park'. This corresponds to Site SH18 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report²⁸). There are no changes to the area covered by this allocation, although there is a decrease in capacity from 630 to 614 dwellings since the Submission stage. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

4.12 MM81: Policy SSH3 – Rattlechain and Land between Addington Way and River Tame

Policy SSH3 – Rattlechain and Land between Addington Way and River Tame

Location Land to the north of Temple Way & Land between Addington Way and River Tame – Tividale

Gross Site Area (Ha) 15.72

Indicative Net Developable Area (Ha) 15.72

Indicative Capacity (and Completion Year) 554 homes (2034-2041)

²⁸ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

Policy SSH3 – Rattlechain and Land between Addington Way and River Tame



SSH3 - Rattlechain and land between Addington Way and
River Tame Temple Way - Strategic Housing Allocation



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2024 and onward

Site constraints

- Although majority of the site is within Flood Zone 1 and at low risk of flooding, land around the River Tame in the east of the site is within Flood Zone 2 and 3.
- The topography of the site falls sharply down to the river, which is within a steep valley.
- Several canal towpath bridges close to the site are listed at Grade II, including at the junction with the Gower Branch Canal (300 metres to the east), and at the Dudley Port Junction (750 metres to the west).
- Ground contamination and stability issues, as the site was previously used for coal mining, as a brick works and clay pit, a tip for fuel ash and commercial waste, and as a deposit for phosphorous waste.
- A small proportion of the site is designated as a Site of Local Importance for Nature Conservation (SLINC).
- There are several mature trees within the site.
- National grid gas mains and overhead electric pylons are present on site.

Successful development of the site will require:

- a) the preparation of a comprehensive masterplan in consultation with the Council, which responds to the Sandwell Design Code (Policy SDS5);

Policy SSH3 – Rattlechain and Land between Addington Way and River Tame

- b) the Exception Test to be passed if all built development is not steered to areas of Flood Zone 1 (Policy SCC5).
- c) an appropriate remediation strategy to be agreed and implemented with relevant stakeholders to address contamination issues (Policy SCO3);
- d) damage to the designated SLINC to be minimised, and full mitigation secured to address any remaining impact on the SLINC (Policy SNE1);
- e) ensuring development protects and enhances the significance of heritage assets and their settings (Policy SHE1).
- f) provision of acceptable vehicular access routes and integration with the surrounding sustainable transport network for vehicles, cyclists and pedestrians (Policy STR5).
- g) a strategy for responding to the NGET overhead transmission lines and any underground cables present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage and how the impact of the assets has been reduced through good design; and
- h) development to protect and enhance the character, nature conservation value, water quality, structural stability and recreational usage of the canal network (Policy SNE6).

4.12.1 Policy SSH3 sets out the proposed site allocation at ‘Rattlechain and Land between Addington Way and River Tame’. This policy corresponds to Sites SH35 and SH36 which have been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report²⁹). There are no changes to the proposed number of dwellings at this site or area covered by this allocation. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

4.13 MM82: Policy SSH4 – North Smethwick Canalside

Policy SSH4 – North Smethwick Canalside

Location North Smethwick Canalside, Smethwick

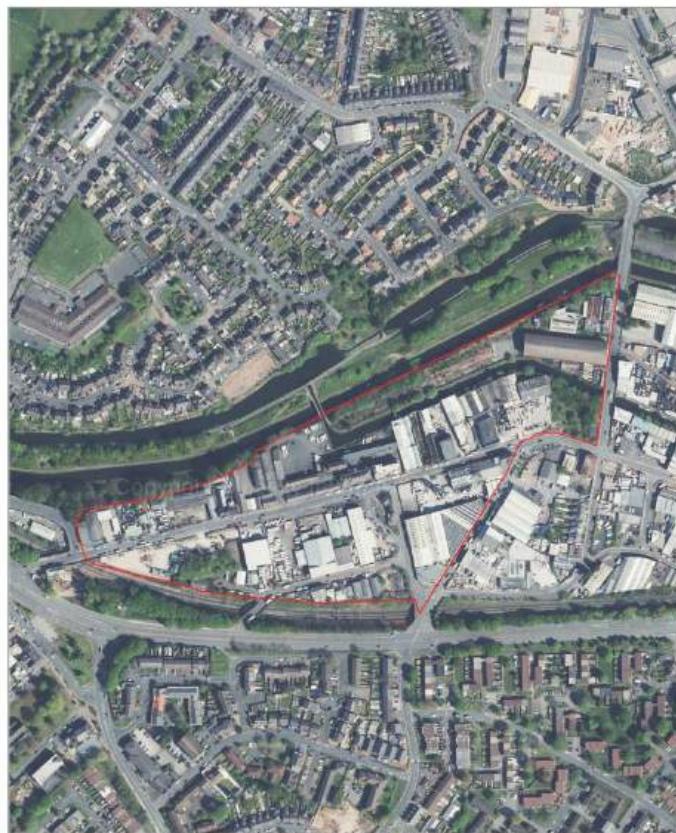
Gross Site Area (Ha) 8.77

Indicative Net Developable Area (Ha) 6.57

Indicative Capacity (and Completion Year) 500 homes (2029-2038)

²⁹ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

Policy SSH4 – North Smethwick Canalside



SSH4 - North Smethwick Canal - Strategic Housing Allocation



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Site constraints

- The site is adjacent to the Birmingham to Wolverhampton railway line.
- The site is adjacent to the Birmingham Mainline canal.
- The site lies partly within the Smethwick Summit Galton Bridge Conservation Area; there are listed structures within and adjacent to the site including a Grade II listed wall and the Grade II* Engine Arm Aqueduct, which is also a scheduled ancient monument.
- There is a possibility of structures buried underground, including water wells at the site of the former Rolfe Street Baths.
- The site contains existing industrial, employment and other uses.

Successful development of the site will require:

- a) general conformity with the Urban Design Framework and Character and Design information set out in the Rolfe Street Masterplan (2023);
- b) investigating, and where appropriate, the protecting of important archaeological assets (Policy SHE4);
- c) safeguarding the amenity of future residents from the possible impact of noise, particularly from the adjacent railway line (Policy SCO2);
- d) ensuring development protects and enhances the significance of heritage assets and their settings (Policy SHE1);
- e) development to protect and enhance the character, nature conservation value, water quality, structural stability and recreational usage of the canal network (Policy SNE6).

4.13.1 Policy SSH4 sets out the proposed site allocation at 'North Smethwick Canalside'. This corresponds to Site SH41 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report³⁰). There are no changes to the proposed number of dwellings at this site or area covered by this allocation. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

4.14 MM84: Policy SSH5 – Abberley Street

Policy SSH5 – Abberley Street

Location Abberley Street, Smethwick

Gross Site Area (Ha) 2.48

Indicative Net Developable Area (Ha) 1.86

Indicative Capacity (and Completion Year) 140 homes (2028-2033)



SSH5 - Abberley Street - Strategic Housing Allocation



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2024 and onward

Site constraints

³⁰ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

Policy SSH5 – Abberley Street

- Possible contamination issues due to past industrial activity
- A canal arm previously passed through the western part of the site and its former route is designated as a Wildlife Corridor
- The site comprises active industrial and employment uses as well as derelict and dilapidated former industrial units.

Successful development of the site will require:

- a) general conformity with the Key Principles set out in the Grove Lane Masterplan (Character Area 6).
- b) the movement of wildlife to be protected and enhanced (Policy SNE1).

4.14.1 Policy SSH5 sets out the proposed site allocation at 'Abberley Street'. This corresponds to Site SH58 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report³¹). There are no changes to the proposed number of dwellings at this site or area covered by this allocation. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

4.15 MM85: Policy SSH6 – Cape Arm Cranford Street

Policy SSH6 – Cape Arm Cranford Street

Location Cape Arm, Cranford Street, Smethwick

Gross Site Area (Ha) 2.42

Indicative Net Developable Area (Ha) 2.13

Indicative Capacity (and Completion Year) 120 homes

³¹ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

Policy SSH6 – Cape Arm Cranford Street



SSH6 - Cape Arm Cranford Street - Strategic Housing Allocation



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Site constraints

- Possible contamination issues due to past industrial activity
- The canal passes through the western and southern edge of the site.
- A proportion of the site is designated as a wildlife corridor.
- There are existing buildings on site.

Successful development of the site will require:

- a) general conformity with the Key Principles set out in the Grove Lane Masterplan (Character Area 2).
- b) development to protect and enhance the character, nature conservation value, water quality, structural stability and recreational usage of the canal network (Policy SNE6); the movement of wildlife to be protected and enhanced (Policy SNE1); and
- c) support for the creation of a green link and active travel route from the Midland Metropolitan University Hospital to Cranford Street (Policy STR5).

4.15.1 Policy SSH6 sets out the proposed site allocation at 'Cape Arm Cranford Street'. This corresponds to Site SH55 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report³²). There are no changes to the area covered by this allocation, although there is a decrease in capacity from 170 to 120 dwellings since the Submission stage. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

4.16 MM86: Policy SSH7 – Cranford Street / Heath Street / Canal

Policy SSH7 – Cranford Street / Heath Street / Canal

Location Cranford Street / Heath Street / Canal, Smethwick

Gross Site Area (Ha) 3.00

Indicative Net Developable Area (Ha) 2.88

Indicative Capacity (and Completion Year) 115 homes (2028-2031)



SSH7 - Cranford Street & Heath Street & Canal - Strategic Housing Allocation



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2024 and onward

Site constraints

³² Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

Policy SSH7 – Cranford Street / Heath Street / Canal

- The northern part of the site along the canal is within the Smethwick Summit Galton Valley Conservation Area.
- The Birmingham Main Line Canal and Cape Arm are designated as a Wildlife Corridor.
- The site is at risk of both surface water and groundwater flooding.
- Possible contamination issues could be present due to past industrial activity.
- The site comprises occupied industrial buildings and a car park.

Successful development of the site will require:

- a) general conformity with the Key Principles set out in the Grove Lane Masterplan (Character Area 1).
- b) development to protect and enhance the character, nature conservation value, water quality, structural stability and recreational usage of the canal network (Policy SNE6); the movement of wildlife to be protected and enhanced (Policy SNE1).
- c) ensuring development protects and enhances the significance of heritage assets and their settings (Policy SHE1).

4.16.1 Policy SSH7 sets out the proposed site allocation at 'Cranford Street / Heath Street / Canal'. This corresponds to Site SH54 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report³³). There are no changes to the proposed number of dwellings at this site or area covered by this allocation. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

4.17 MM87: Policy SSH8 – Grove Lane / Cranford Street / London Street

Policy SSH8 – Grove Lane / Cranford Street / London Street

Location Grove Lane / Cranford Street / London Street, Smethwick

Gross Site Area (Ha) 2.04

Indicative Net Developable Area (Ha) 2.04

Indicative Capacity (and Completion Year) 500 homes (2026-2032)

³³ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

Policy SSH8 – Grove Lane / Cranford Street / London Street



SSH8 - Grove Lane & Cranford Street & London Street - Strategic Housing Allocation



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Site constraints

- Possible contamination issues due to past industrial activity.
- The site comprises occupied industrial buildings and premises.

Successful development of the site will require:

- a) general conformity with the Key Principles set out in the Grove Lane Masterplan (Character Area 7).

4.17.1 Policy SSH8 sets out the proposed site allocation at 'Grove Lane / Cranford Street / London Street'. This corresponds to Site SH53 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report³⁴). There are no changes to the proposed number of dwellings at this site or area covered by this allocation. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

³⁴ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

4.18 MM88: Policy SSH9 – Grove Street / MMUH

Policy SSH9 – Grove Street / MMUH

Location Grove Street, Smethwick

Gross Site Area (Ha) 2.18

Indicative Net Developable Area (Ha) 2.18

Indicative Capacity (and Completion Year) 85 homes and a two-form entry primary school (2029-2031)



SSH9 - Grove Street / MMUH / School - Strategic Housing Allocation



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Site constraints

- Possible contamination issues due to past industrial activity.
- The site comprises occupied older industrial buildings.

Successful development of the site will require:

- a) general conformity with the Key Principles set out in the Grove Lane Masterplan (Character Area 4); and
- b) the requirement for a new school as part of the delivery of the Grove Lane Masterplan to be revisited and fully assessed; and

Policy SSH9 – Grove Street / MMUH

c) taking account of possible future redevelopment of Moilliett Street Park in Birmingham as envisaged by the Smethwick to Birmingham Corridor Framework.

4.18.1 Policy SSH9 sets out the proposed site allocation at 'Grove Street / Midland Metropolitan University Hospital (MMUH)'. This corresponds to Site SH57 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report³⁵). There are no changes to the proposed number of dwellings at this site or area covered by this allocation. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

4.19 MM89: Policy SSH10 – Moilliett Street Park

Policy SSH10 – Moilliett Street Park

Location Moilliett Street Park, Smethwick

Gross Site Area (Ha) 0.77

Indicative Net Developable Area (Ha) 0.77

Indicative Capacity (and Completion Year) 35 homes (2029-2030)

³⁵ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

Policy SSH10 – Moilliett Street Park



SSH10 - Moilliett Street Park - Strategic Housing Allocation



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Site constraints

- Possible contamination and ground issues due to past industrial activity.
- The site comprises occupied industrial buildings.

Successful development of the site will require:

- a) general conformity with the Key Principles set out in the Grove Lane Masterplan (Character Area 5); and
- b) taking account of possible future redevelopment of Moilliett Street Park in Birmingham as envisaged by the Smethwick to Birmingham Corridor Framework.

4.19.1 Policy SSH10 sets out the proposed site allocation at 'Moilliett Street Park'. This corresponds to Site SH56 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report³⁶). There are no changes to the proposed number of dwellings at this site or area covered by this allocation. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

³⁶ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

4.20 MM91: Policy SSM1 – Lion Farm

Policy SSM1 – Lion Farm

Location Lion Farm Playing Fields, Newbury Lane, Oldbury

Gross Site Area (Ha) 20.92

Indicative Net Developable Area (Ha) 4.5

Indicative Capacity (and Completion Year) 200 residential dwellings, 2.3 hectares of employment land, playing fields and associated facilities, and green space (2033-2037)



SSM1 - Lion Farm - Strategic Mixed Use Allocation



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2024 and onward

Site constraints

- The site comprises 11 adult-size football pitches
- NGET overhead transmission lines and underground cables are present within the site (YJ ROUTE: 275Kv Overhead Transmission Line route: KITWELL - OCKER HILL 275Kv Underground Cable route: KITWELL 275KV S/S)
- A canal spur and various canal basins crossed the site historically, providing waterway access to a former brickworks and various coal shafts. Made ground, subterranean structures and untreated mine shafts may be present.

Policy SSM1 – Lion Farm

- The central part of the site is in Flood Zone 2 and Flood Zone 3, comprising approximately 9% of the total site area.

Successful development of the site will require:

- that existing playing fields are not built on unless a mitigation package that takes account of local and any cross-boundary needs that are currently being served is agreed in accordance with NPPF paragraph 103 (Policy SHW5);
- a strategy for responding to the NGET overhead transmission lines and underground cables present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage and how the impact of the assets has been reduced through good design;
- development to be located in areas of lowest flood risk (Policy SCC5);
- investigating, and where appropriate protecting important archaeological assets (Policy SHE4);
- preparation of a masterplan that identifies parts of the site for very high-density housing (Policy SHO3); and
- new employment development within Use Classes E(g)(ii), E(g)(iii), B2 or B8 (Policy SEC1).

4.20.1 Policy SSM1 sets out the proposed site allocation at 'Lion Farm'. This corresponds to Site SM2 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report³⁷). There are no changes to the proposed number of dwellings at this site or area covered by this allocation. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

4.21 MM93: Policy SSM2 – Cultural Quarter

Policy SSM2 – Cultural Quarter

Location Cultural Quarter, High Street, West Bromwich

Gross Site Area (Ha) 1.09

Indicative Net Developable Area (Ha) 1.09

Indicative Capacity (and Completion Year) 52 residential dwellings, 1,054sqm food and beverage, 2,000sqm community/leisure and 10 car parking spaces (2025-2031)

³⁷ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

Policy SSM2 – Cultural Quarter



SSM2 - Cultural Quarter - Strategic Mixed Use Allocation



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Site constraints

- Designated heritage assets present within and adjacent to the site including the West Bromwich High Street Conservation Area, Grade II Central Public Library, Grade II Town Hall, and Grade II Law Courts.
- The site includes an existing public car park.

Successful development of the site will require:

- a) the protection of the significance of heritage assets and the conservation and enhancement of local character and those aspects of heritage assets and their settings that are recognised as being of special quality (Policies SHE1 and SHE2);
- b) regenerating the Town Hall Quarter to establish a fully restored cultural and evening / night-time offer in the town centre (Policy SWB1);
- c) delivery of a mixed-use development including new homes (Policy SWB2); and
- d) general conformity with the Key Information set out in the West Bromwich Masterplan (Zone 3).

4.21.1 Policy SSM2 sets out the proposed site allocation at 'Cultural Quarter'. This corresponds to Site SM5 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report³⁸). There are no changes to the proposed number of dwellings at this site or area covered by this allocation. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

4.22 MM94: Policy SSM3 – George Street Living

Policy SSM3 – George Street Living

Location George Street Living, Trinity Way, West Bromwich

Gross Site Area (Ha) 2.36

Indicative Net Developable Area (Ha) 1.77

Indicative Capacity (and Completion Year) 327 residential units, 1,150sqm community/leisure, 79 parking spaces (2035-2040)



SSM3 - George Street Living - Strategic Mixed Use Allocation



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2024 and onward

³⁸ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

Policy SSM3 – George Street Living

Site constraints

- The site comprises light industrial and storage uses as well as ancillary office and retail uses. A former industrial site (Spring Works) has been cleared. Made ground and subterranean structures may be present.
- Safeguarding the amenity of future residents from the impacts of surrounding land uses including industrial uses to the north and the dualled A4031 Trinity Way to the east

Successful development of the site will require:

- a) delivery of residential-led development including new homes built at very high densities (Policies SWB2 and SHO3); and
- b) general conformity with the Key Information set out in the West Bromwich Masterplan (Zone 5).

4.22.1 Policy SSM3 sets out the proposed site allocation at ‘George Street Living’. This corresponds to Site SM8 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report³⁹). There are no changes to the proposed number of dwellings at this site or area covered by this allocation. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

4.23 MM95: Policy SSM4 – Queens Square

Policy SSM4 – Queens Square

Location Queens Square Living, High Street, West Bromwich

Gross Site Area (Ha) 2.84

Indicative Net Developable Area (Ha) 2.13

Indicative Capacity (and Completion Year) 396 residential units, 7,447sqm retail, 855sqm offices, 1,395sqm community/leisure, 206 car parking spaces (2038-2041)

³⁹ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

Policy SSM4 – Queens Square



SSM6 - Queens Square - Strategic Mixed Use Allocation



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Site constraints

- The site comprises existing retail units and other main town centre uses.

Successful development of the site will require:

- a) delivery of mixed-use development including new homes built at very high densities (Policies SWB2 and SHO3); and
- b) general conformity with the Key Information set out in the West Bromwich Masterplan (Zone 2).

4.23.1 Policy SSM4 sets out the proposed site allocation at 'Queens Square'. This corresponds to Site SM6 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report⁴⁰). There are no changes to the proposed number of dwellings at this site or area covered by this allocation. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

⁴⁰ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

4.24 MM96: Policy SSM5 – West Bromwich Central

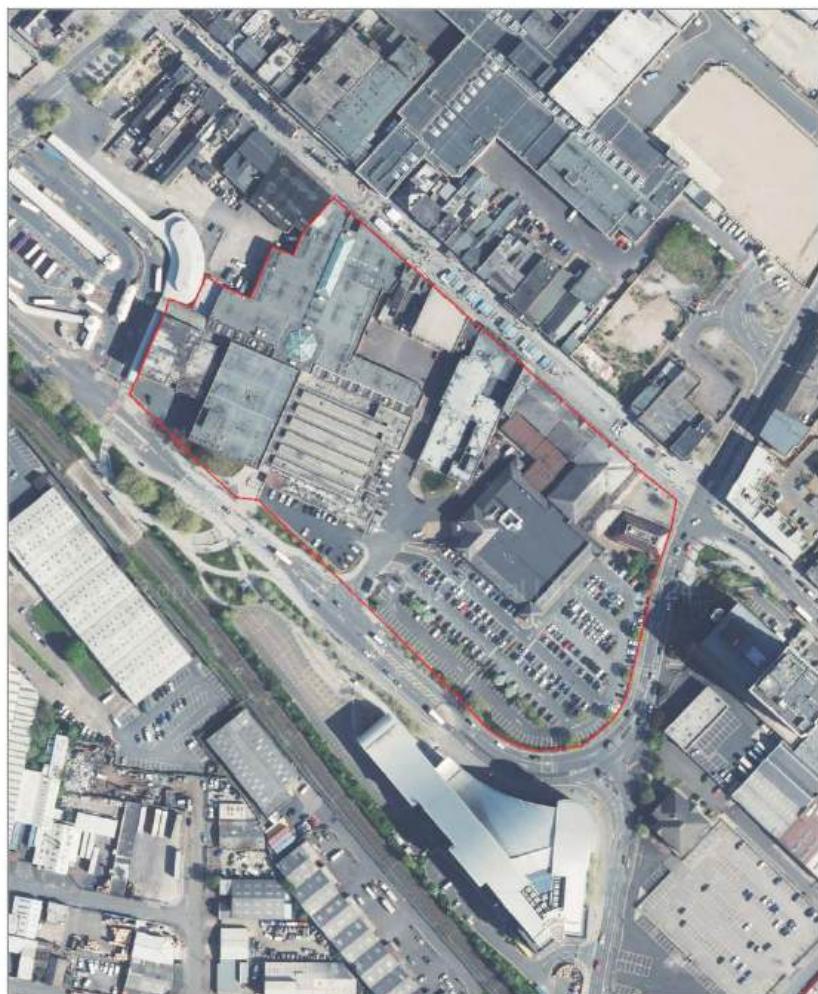
Policy SSM5 – West Bromwich Central

Location West Bromwich Central, High Street, West Bromwich

Gross Site Area (Ha) 3.84

Indicative Net Developable Area (Ha) 2.85

Indicative Capacity (and Completion Year) 343 residential units, 2,302sqm retail, 5,032sqm offices, 5,060sqm education, 11,840sqm food and beverage, 9,862sqm community/leisure, 5,205sqm health and 625 parking spaces (2029-2035)



SSM5 - West Bromwich Central - Strategic Mixed Use Allocation



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Site constraints

- The site comprises existing retail units, other main town centre uses and a privately owned publicly accessible car park.

Successful development of the site will require:

- the creation of a metro gateway, a new town square and a green link through to the heart of the town centre from the metro stop (Policy SWB1);

Policy SSM5 – West Bromwich Central

- b) delivery of mixed-use development including new homes built at very high densities (Policies SWB2 and SHO3); and
- c) general conformity with the Key Information set out in the West Bromwich Masterplan (Zone 1).

4.24.1 Policy SSM5 sets out the proposed site allocation at ‘West Bromwich Central’. This corresponds to Site SM7 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report⁴¹). There are no changes to the proposed number of dwellings at this site or area covered by this allocation. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

4.25 MM98: Policy SSE1 – Coneygree Business Park (Open Land)

Policy SSE1 – Coneygree Business Park (Open Land)

Location Coneygree Business Park (Open Land)

Gross Site Area (Ha) 7.22

Indicative Net Developable Area (Ha) 7.22

Indicative Capacity 7.22 hectares of employment uses (E(g)(ii), E(g)(iii), B2, and B8 uses)

⁴¹ Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

Policy SSE1 – Coneygree Business Park (Open Land)



SSE1 - Coneygree Business Park (Open Land) - Strategic Employment Allocation



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Site constraints

- Coal mining legacy identified at the site and several existing mineshafts spread across the site.
- It is situated in a Limestone Consideration Zone.
- The land undulates in several areas, with a differential of up to 18 metres from the highest to the lowest points.
- A culverted watercourse runs through the middle of the site from the southwest to northeast.
- Adjacent to a canal and contains four filled historical canal arms / basins in the northern section of the site.

Successful development of the site will require:

- a) an appropriate remediation strategy to be agreed with relevant stakeholders to address contamination issues (Policy SCO3);
- b) investigation, and where appropriate protection of important archaeological assets (Policy SHE4);
- c) development to protect and enhance the character, nature conservation value, water quality, structural stability and recreational usage of the canal network (Policy SNE6);
- d) assessing the feasibility of opening up and naturalising any underground culverts. Should this prove impractical, no development over culverted watercourse and allowing a suitable easement from the outside edge of the culvert (Policy SCC5).

4.25.1 Policy SSE1 sets out the proposed site allocation at 'Coneygree Business Park (Open Land)'. This corresponds to Site SEC1-5 which has been evaluated in the HRA process alongside other SLP allocations (see Appendix D of the Submission HRA Report⁴²). There are no changes to the proposed number of dwellings at this site or area covered by this allocation. This policy will therefore not result in a change to the findings of the Submission HRA (2024).

⁴² Lepus Consulting (December 2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 23/12/25]

5 Conclusions

5.1 Summary

5.1.1 This HRA report appraises the Schedules of Proposed Main Modifications to the SLP (December 2025) that have been prepared by SMBC. The Main Modifications to the SLP, which will cover the period from 2024 to 2041, have been put forward by SMBC in response to the Local Plan Inspector's Matters, MIQs, notes and letters received throughout the examination process.

5.1.2 A total of 105 Main Modifications to the SLP have been proposed, as well as 67 Additional Modifications and 15 Policies Map Modifications. Details of the Council's proposed schedule of Main Modifications are set out in **Appendix A** of this report.

5.1.3 Each proposed modification has been evaluated in **Appendix A** to understand if it will result in new LSEs on European sites, and whether the conclusions of the HRA process for the submitted SLP remain valid in light of these modifications. The methodology for the assessment process is the same as that used at all earlier stages in the HRA of the submitted SLP.

5.1.4 The assessment indicates that the majority of the proposed modifications do not result in a change to the outcomes of the HRA prepared at the submission stage of plan-making. However, 23 policies represent circumstances where it cannot be conclusively ruled out, at this stage, that likely significant effects on European sites may arise. These policies have therefore been identified for further consideration within the HRA screening process, in accordance with the established assessment methodology.

5.1.5 Whilst the modifications introduce an uplift in housing and employment numbers in the SLP through the following six policies, the overall magnitude does not change the assessment conclusions that were reached in the HRA at submission.

- SDS1: Spatial Strategy for Sandwell
- SDS3: Regeneration in Sandwell
- SDS4: Towns and Local Areas
- SHO1: Delivering Sustainable Housing Growth
- SEC1: Providing for Economic Growth and Jobs
- SWB2: Development in West Bromwich

5.1.6 Given the strategic nature of the traffic, air quality and water quality modelling that was drawn upon to inform the Submission HRA AA, and the continued inclusion of protective water policies within the SLP and the higher level regulatory framework, it is considered unlikely that the proposed uplift triggered by modifications to these policies would change the overall conclusions made in the Submission HRA.

5.1.7 MM74 (Hot Food Takeaways) combines two policies together, Policies SDM6 and SDM7. The modified policy does not alter the scale, nature, or location of development in a manner that would result in adverse effects on the integrity of any European site.

5.1.8 The following 16 policies relate to sites evaluated in the HRA process and reported upon in the Submission HRA. Although there are some increases and decreases in the housing numbers, it is considered that the findings of the Submission HRA (2024) remain valid and the modified policies do not alter the scale, nature, or location of development in a manner that would result in adverse effects on the integrity of any European site.

- MM79: Policy SSH1 – Edwin Richards Quarry
- MM80: Policy SSH2 – Friar Park
- MM81: Policy SSH3 – Rattlechain and Land between Addington Way and River Tame
- MM82: Policy SSH4 – North Smethwick Canalside
- MM84: Policy SSH5 – Abberley Street
- MM85: Policy SSH6 – Cape Arm Cranford Street:
- MM86: Policy SSH7 – Cranford Street / Heath Street / Canal
- MM87: Policy SSH8 – Grove Lane / Cranford Street / London Street
- MM88: Policy SSH9 – Grove Street / MMUH
- MM89: Policy SSH10 – Moilliett Street Park
- MM91: Policy SSM1 – Lion Farm
- MM93: Policy SSM2 – Cultural Quarter
- MM94: Policy SSM3 – George Street Living
- MM95: Policy SSM4 – Queens Square
- MM96: Policy SSM5 – West Bromwich Central
- MM98: Policy SSE1 – Coneygree Business Park (Open Land)

Conclusions

5.1.9 This assessment concludes that the modifications evaluated in this report (including **Appendix A**) will not alter the scale, nature, or location of development in a manner that would result in adverse effects on the integrity of any European site.

5.1.10 It can therefore be concluded that the proposed modifications to the SLP will not give rise to adverse impacts on the site integrity of any European site, either alone or in combination with other plans or projects.

Appendix A: Initial Evaluation of Main Modifications

Appendix A Initial Evaluation of Main Modifications

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A.1 Introduction

A.1.1 Overview

A.1.1.1 This appendix includes the Proposed Main Modifications to the Sandwell Local Plan (SLP) 2024-2041 (December 2025). The SLP was submitted for Examination on 11th December 2024¹.

A.1.1.2 The tables within this appendix replicate the Schedules of Proposed Main Modifications to the Local Plan (October 2025) prepared by the Council, whereby the modifications are expressed in the form of **strikethrough** for deletions and **underlining** for additions of text. An additional column has been included in the table as presented within this appendix to allow an assessment of the Schedules of Proposed Main Modifications in the context of the HRA.

A.1.1.3 All of the proposed Main Modifications are set out in the Schedules of Proposed Main Modifications: Main Modifications, Additional Modifications and Policy Map Modifications. The findings of the Submission Habitats Regulations Assessment (Regulation 22)² remain valid where the changes proposed in the SLP do not require amendment. Where those proposed changes do require amendment, these have been assessed through the HRA process within the main body of this Main Modifications HRA Report.

A.1.1.4 The purpose of this Appendix is to evaluate the proposed modifications to assess whether the modification would be likely to lead to new likely significant effects (LSEs) or whether there is no change to the conclusions of the Submission HRA as a result of the modifications. Where no new LSEs are identified, the conclusions in the Submission HRA Report remain valid.

¹ Sandwell Metropolitan Borough Council (2025) Sandwell Local Plan Examination. Available at:

<https://www.sandwell.gov.uk/planning-planning-policy/sandwell-local-plan-examination> [Date accessed: 04/11/25]

² Lepus Consulting (2024) Habitats Regulations Assessment of the Sandwell Local Plan. Submission Habitats Regulations Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/3525/habitats-regulations-assessment-hra-slp-submission-version> [Date accessed: 08/01/26]

A.2 Main Modifications

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
MM1	various	<p>Update housing supply figure from 10,434 to <u>11,901</u> throughout plan, plus consequential and related changes</p> <p>Update unmet housing need figure from 15,916 to <u>14,449</u> homes throughout plan.</p>	Update	<p>Yes – the proposed modification introduces a change to the housing numbers to reflect additions to sites with planning permission (i.e. committed development), changes to the windfall allowance and the removal of discounting made in the Submission SLP.</p> <p>This change is contained within Policy SDS1 (MM5) and Policy SHO1 (MM35) which have been assessed in the Main Modifications HRA Report.</p>

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?																		
MM2	Following paragraph 10 - 11	<p>Reference in text to list of superseded policies and documents in Appendix N (now Appendix L).</p> <p><u>12. The SLP includes some policies based on original versions found in the SAD and BCCS, and others based on the policies set out in the draft Black Country Plan. A list of previously adopted policies and other planning documents that are superseded by the SLP is included in Appendix L, together with references to the specific SLP policies that will replace them.</u></p>	Clarification	No – the proposed modification updates introductory SLP text for clarity and does not trigger a change to the conclusions of the HRA.																		
MM3	Paragraph 17 - 18	<p>Amend text:</p> <p><u>17. Agreement through Statements of Common Ground (SoCG) are now a necessity and will document the cross-boundary matters that need to be <u>are being</u> addressed and what progress has been made in dealing with them.</u></p> <p>Delete text:</p> <p><u>18. Discussions are ongoing with neighbouring authorities and potential contributions to the Black Country and the Greater Birmingham and Black Country Housing Market Area (GBBC HMA) have been offered in several Local Plans, however these are still to be adopted and the offers may change. The DtC statement sets out where and with whom discussions have taken place and how the council has sought to address the shortfall, it will also include Statements of Common Ground (SoCG) that have been agreed to date. The table below sets out the potential contributions following discussions to date and will be updated as necessary and when contributions have been confirmed:</u></p> <p>Update and amend table:</p> <p><i>Table 1 – Duty to Cooperate Contributions</i></p> <table border="1"> <thead> <tr> <th>Contributing Authority</th> <th>Contribution to</th> <th>Land Type</th> <th>Total Potential Contribution</th> <th>Sandwell's Confirmed apportionment</th> </tr> </thead> <tbody> <tr> <td rowspan="2"><i>Shropshire Council*</i></td> <td rowspan="2"><i>Black Country Authorities</i></td> <td><i>Residential</i></td> <td><i>1,500</i></td> <td><i>0</i></td> </tr> <tr> <td><i>Employment</i></td> <td><i>30 ha</i></td> <td><i>0 ha</i></td> </tr> <tr> <td><i>South Staffordshire</i></td> <td><i>GBBC HMA</i></td> <td><i>Residential</i></td> <td><i>640</i></td> <td><i>0</i></td> </tr> </tbody> </table>	Contributing Authority	Contribution to	Land Type	Total Potential Contribution	Sandwell's Confirmed apportionment	<i>Shropshire Council*</i>	<i>Black Country Authorities</i>	<i>Residential</i>	<i>1,500</i>	<i>0</i>	<i>Employment</i>	<i>30 ha</i>	<i>0 ha</i>	<i>South Staffordshire</i>	<i>GBBC HMA</i>	<i>Residential</i>	<i>640</i>	<i>0</i>	Update	No – the proposed modification updates the plan with reference to the latest Duty to Cooperate agreements with neighbouring authorities. The modification does not change the conclusions of the HRA.
Contributing Authority	Contribution to	Land Type	Total Potential Contribution	Sandwell's Confirmed apportionment																		
<i>Shropshire Council*</i>	<i>Black Country Authorities</i>	<i>Residential</i>	<i>1,500</i>	<i>0</i>																		
		<i>Employment</i>	<i>30 ha</i>	<i>0 ha</i>																		
<i>South Staffordshire</i>	<i>GBBC HMA</i>	<i>Residential</i>	<i>640</i>	<i>0</i>																		

Ref	Page / paragraph / policy reference	Proposed change					Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
			<u>Black Country Authorities</u>	Employment	<u>112.2ha</u>	0 ha		
		Cannock	<u>GBBC HMA</u>	<u>Residential</u>	<u>500</u>	0		
		Telford	<u>Black Country Authorities</u>	Residential	<u>1600-153 per annum (2020 – 2040) **</u>	0		
		<u>Total</u>		<u>Residential</u>		0		
				<u>Employment</u>		0 ha		
		<p><u>*Shropshire withdrew their plan in July 2025, so their contribution has also now been withdrawn.</u></p> <p><u>** Contribution based on publication version of Telford's plan, February 2025</u></p>						
MM4	Paragraph 2.6	<p>Amend text:</p> <p><i>The SLP provides for around one third <u>nearly half</u> of the <u>its</u> housing need on the land that is available in Sandwell.</i></p>						Clarification and correction No – the proposed modification updates introductory SLP text for clarity and does not trigger a change to the conclusions of the HRA.
MM5	SDS1.1a	<p>Include reference to plan period:</p> <p><i>... a. deliver at least 10,434 <u>11,901</u> net new homes <u>across the plan period</u> and create sustainable mixed communities ...</i></p>						Clarification and amendment Yes – the proposed modification introduces a change to the housing numbers to reflect additions to sites with planning permission (i.e. committed development), changes to the windfall allowance and the removal of

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
				discounting made in the Submission SLP. This change has been assessed in the Main Modifications HRA Report.
SDS1.1b		<p>Insert new criterion b, subsequent bullet points renumbered:</p> <p><i>b. seek to meet existing Gypsy, Travellers and Travelling Showpeople needs as far as possible.</i></p> <p>Add reference to plan period and signpost to employment policies (except Policy SEC4):</p> <p><i>b.c. maintain the ongoing provision of around 1,221ha of allocated employment land, <u>across the plan period</u>, (of which 28ha is currently vacant) <u>(Policies SEC1 – SEC3)</u>;</i></p>	Clarification and amendment	No – the proposed modification relates only to the renumbering of bullet points and references for clarity and does not trigger a change to the conclusions of the HRA.
SDS1.1c		<p>Reflect the changes made to paragraph 89f (AM8):</p> <p><i>c. ensure that sufficient physical, social, <u>emergency services, utility</u> and environmental infrastructure is delivered to meet identified requirements;</i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
SDS1.1h		<p>Amend to refer to exceptional circumstances:</p> <p><i>h. protect the openness, integrity and function of Sandwell's designated green belt by resisting inappropriate development in it, <u>except in circumstances as set out in national guidance</u>;</i></p>	Clarification and reflection of national guidance	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
	SDS1.1i	<p>Include a reference to Nature Recovery:</p> <p>... <i>by resisting inappropriate development in it;</i></p> <p><i>i. protect habitats and areas of ecological value <u>and support nature recovery</u>;</i></p> <p><i>j. conserve the significance ...</i></p>	Clarification and update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SDS1.1j	<p>Amend text:</p> <p><i>j) conserve the significance of the historic environment, particularly in relation to <u>designated heritage assets and their settings</u>, ...</i></p>	Correct nomenclature	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SDS1.2	<p>Amend text:</p> <p><i>2. The SLP seeks to ensure this growth is sustainable by requiring the following issues are addressed in planning proposals:</i></p> <p><i>... b. <u>allocating ensuring housing is delivered</u> in locations with the highest levels of sustainable transport access to residential services (e.g. retail provision, schools, healthcare facilities, fresh food, employment etc.), <u>such as near railway stations, metro stops and public transport hubs, and making effective use of land through the application of minimum densities (Policy SH03)</u>:</i></p> <p><i>d. <u>allocating ensuring</u> new employment land <u>is delivered in locations</u> where sustainable access ...</i></p> <p>Add a new criterion on designing out crime and addressing public safety:</p> <p><i>... and minimise detrimental impacts on the transport network;</i></p> <p><i>h. <u>ensuring all new development is designed to minimise the opportunities for crime and antisocial behaviour to occur and to optimise public and individual safety</u>;</i></p> <p><i>h.i. <u>supporting and enhancing the sustainability</u> ...</i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
	SDS1.3 Paragraph 3.3	<p>Amend criterion 1.3 of policy to include reference to strategic sites:</p> <p><i>Appendices B and C Chapters 16 and 17 show how the housing and employment land ambitions for Sandwell will be met. They include strategic site policies for housing and employment and mixed use, and non-strategic allocations. Those development needs that cannot be accommodated within the borough will be exported to sustainable locations ...</i></p> <p>Amend justification text to identify sources of supply:</p> <p><i>3.3 The economy and population of Sandwell are both growing. The Council needs to plan for continued economic recovery and growth and enhanced business productivity. It has also identified land a housing supply for at least 10,434 11,901 new homes within the plan period. This comprises identified sites, windfall allowance, additional floorspace in centres and additional supply identified in the Wednesbury Masterplan. To accommodate this future growth, sites and locations that are both sustainable and deliverable have been identified for development, at levels that do not breach the environmental capacity of the area.</i></p> <p>Introduce new paragraph 3.4:</p> <p><i>3.4 In Chapter 16, the Council has identified sites that it considers to be of strategic importance in delivering the housing and employment land needed in Sandwell. Reflecting local circumstances, strategic housing sites are defined as sites capable of delivering over 500 dwellings; sites identified in the West Bromwich and Grove Lane Masterplans are identified as providing strategic benefits. These sites represent a significant proportion of the planned housing growth and are critical to achieving housing requirement of the Sandwell Local Plan.</i></p> <p><i>3.5 One strategic employment site has been allocated. It is a vacant site of over seven hectares that was identified and assessed through the Black Country Economic Development Needs Assessment and Black Country Employment Area Review as important to the delivery of strategic economic growth.</i></p> <p><i>3.6 A mixed-use site has also been identified as of strategic importance, as it provides for a significant amount of housing and employment land in a location with very good links to the strategic highways network.</i></p> <p>Consequential renumbering of subsequent paragraphs</p>	Clarity on type of allocations and sources of housing supply.	No – the proposed modification relates to points of clarity in relation to the justification text and does not trigger a change to the conclusions of the HRA.
MM6	SDS2.2	Amend policy text to reflect flexibility:	Clarification and consistency	No – the proposed modification relates to points of clarity and does not trigger a

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p>2. Proposals for development will need to demonstrate how they have been designed to maximise resistance and resilience to climate change through addressing the following requirements <u>where relevant and in accordance with other policy obligations</u>: ...</p> <p>Amend text:</p> <p>... 2b. development proposals will need to meet the needs of all sections of the community ...</p>		change to the conclusions of the HRA.
	SDS2.2 e	<p>Amend text:</p> <p>e. <u>where practicable</u>, all development will need to utilise sustainable drainage systems, which should be built into landscaping schemes / open space provision as appropriate (Policy SCC6), and prioritise natural drainage solutions ...</p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SDS2.2.h	<p>Amend text:</p> <p>h. <u>applications for planning permission</u> <u>proposals for development</u> should promote circular economy outcomes and seek to reduce whole life-cycle carbon emissions...</p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SDS2.2 i	<p>Amend text:</p> <p>... where this will not cause <u>an unacceptable level</u> of harm to the historic fabric, character, setting or appearance of the asset ...</p>	To be consistent with NPPF.	No – the proposed modification ensures consistency with the NPPF and does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
	SDS2.2 j	<p>Amend text:</p> <p><i>Proposals for development related to climate change adaptation and mitigation that would adversely affect the <u>setting significance</u> of heritage assets should be designed to avoid such impacts. Where this is not possible, developers must demonstrate that schemes have been designed to minimise those impacts. Where this cannot be demonstrated, the presumption will be against the grant of planning permission (Policies SHE1 – SHE4).</i></p>	To be consistent with NPPF.	No – the proposed modification ensures consistency with the NPPF and does not trigger a change to the conclusions of the HRA.
MM7	SDS3.3b	<p>Amend text:</p> <p><i>b. As set out in the West Bromwich Masterplan residential and employment growth will be sought at a transformational level to help create a vibrant and sustainable town centre with a diverse range of uses...</i></p>	Clarify definition of "transformational"	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SDS3.6a	<p>Amend wording:</p> <p><i>... the SLP Policies Plan Map.</i></p>	correction	No – the proposed modification relates to a correction and does not trigger a change to the conclusions of the HRA.
	SDS3.7 b	<p>Amend text:</p> <p><i>... b. Retail, residential, and mixed-use development will be encouraged in Wednesbury Town Centre⁴⁰</i></p> <p><i>⁴⁰ Please also see Appendix D B and https://regeneratingsandwell.co.uk/sandwell_projects/wednesbury-high-street-heritage-action-zone/</i></p>	Include further clarification on Heritage Action Zone work	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
	SDS3.8d and e	<p>Additional text:</p> <p>d. <i>The principal locations for new industrial and logistics development – providing at least 584 <u>495</u>ha of employment land, designated as SEC1, 2 and 3 sites on the SLP Policies Plan, to meet growth needs.</i></p> <p><i>A minimum of 2,134 <u>3,037</u> new homes (discounted) of mixed type and tenure....</i></p>	<p>Clarify origin of figure and update.</p> <p>Deletion of "discounted" for consistency with rest of SLP</p>	<p>Yes – the proposed modification introduces a change to the housing and employment numbers to reflect additions to sites with planning permission (i.e. committed development), changes to the windfall allowance and the removal of discounting made in the Submission SLP.</p> <p>This change has been assessed in the Main Modifications HRA Report.</p>
	Paragraph 3.36c	<p>Correct figures:</p> <p><i>... they include clusters of housing / employment development opportunities providing at least 2,219 <u>3,037</u> homes (discounted, these sites are already included in the supply detailed in Policy SH01) and 584 <u>495</u>ha of strategic and local employment areas.</i></p>	<p>Corrected figures and deletion of "discounted" for consistency with rest of SLP.</p>	<p>No – the proposed modification relates to points of clarity within the justification text only.</p>
MM8	SDS4.1a	<p>Amend text:</p> <p>1. <i>Towns and local communities outside West Bromwich and the regeneration areas identified in Figure 3 will provide:</i></p>	<p>Clarification and correction to refer to</p>	<p>Yes – the proposed modification introduces a change to the housing and</p>

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p>a. <i>a minimum of 474 6,503 new homes delivered through:</i></p> <ul style="list-style-type: none"> i. <i>the allocation of previously identified housing sites, or ones submitted as part of a <u>the Local Plan Call for Sites exercise</u>⁴⁹;</i> ii. <i>the repurposing of a small number of brownfield employment sites and other previously developed and surplus land for new housing;</i> <p><i>small scale residential development on windfall sites submitted through the planning application process opportunities in highly sustainable locations;</i></p>	<p>all parts of the borough outside the regeneration areas.</p> <p>Express housing target as a minimum.</p> <p>Clarify call for sites exercise.</p> <p>Consistency in referring to small scale sites</p>	<p>employment numbers to reflect additions to sites with planning permission (i.e. committed development), changes to the windfall allowance and the removal of discounting made in the Submission SLP.</p> <p>This change has been assessed in the Main Modifications HRA Report.</p>
SDS4.1c		<p>c. <i>Approximately 637 726ha of identified employment land, designated as SEC1, 2 and 3 sites on the SLP Policies Map, to meet employment needs;</i></p>	Correction	As above
Paragraph 3.58		<p>Amend text:</p> <p><i>Policy SDS4 sets out the strategic approach for Sandwell's other towns and local areas <u>towns and local areas outside of the regeneration areas</u>.</i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
Paragraph 3.59		<p>Additional justification text:</p>	Clarification	No – the proposed modification relates to

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p><i>Sandwell is made up of several towns and small local communities and is a highly urbanised area. It also contains various existing local employment areas. Towns and local areas outside of the regeneration areas (SDS3) will provide at least 6,507 new homes and 726ha of identified employment land.</i></p>		points of clarity for the justification text.
MM9	SDS5.1	<p>Amend the policy wording to address any hiatus prior to the adoption of the Council's own Design Code:</p> <ol style="list-style-type: none"> <i>1. A Design Code supplementary plan will be produced for Sandwell, reflecting local character and design preferences, and providing a framework for creating high quality places. Prior to this being produced and adopted, the Council expects applicants to have regard to the requirements of the National Model Design Code, the West Midlands Design Code and Sandwell's extant design guidance, as well as to the design-related requirements of all relevant policies in the SLP itself.</i> <i>2. In some cases, the Council may work with applicants to approve a masterplan or site-specific design code to meet the requirements of a site and its surrounding environment (see Policy 6</i> <i>3. 1 and supporting text).</i> <p><i>2. The design of new development will be expected...</i></p>	Update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SDS5.5	<p>Amend text:</p> <p><i>5. ... make a positive contribution to place-making and environmental improvement (Policies SNE1 – SNE3), including through the provision of green and blue infrastructure and improvements to local biodiversity, using design codes, design and access statements,</i></p>	Clarification and additional text	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM10	SDS6	<p>Amend the title of the policy to reference Community Facilities.</p> <p><i>Policy SDS6 – Cultural and Community Facilities and the Visitor Economy</i></p> <p>Make changes to parts 1, 3 and 6 of Policy SDS6 and in justification text.</p> <p>Development proposals</p> <ol style="list-style-type: none"> 1. Cultural, tourist, and leisure and community facilities within Sandwell will, wherever possible, be protected, enhanced and expanded (where appropriate) in partnership with key delivery partners and stakeholders. 3. Proposals for new cultural, tourist or leisure and community facilities or uses, or extensions to existing ones, should: 	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p>a. be of a high-quality design;</p> <p>b. be highly accessible and sustainable, being located within centres wherever possible;</p> <p>c. not adversely impact on residential amenity or the operation of existing businesses; and</p> <p>d. be designed to be flexible, adaptable, and where possible be capable of alternative or community use.</p> <p>6. Development that would lead to the loss of an existing cultural / tourism/<u>community</u> facility in Sandwell will be resisted unless:</p> <p>a. the intention is to replace it with a facility that will provide an improved cultural, or tourist <u>or community</u> offer;</p> <p>b. it can be demonstrated that there would be significant benefits to the local and wider community in removing the use and / or redeveloping the site; or</p> <p>c. An appropriate contribution is made to support and sustain an alternative local cultural, tourist, or leisure <u>or community</u> facility.</p> <p>Para 3.85</p> <p>The range and diversity of cultural, and tourist <u>and community</u> assets in the Black Country.....</p>		
SDS6.1 SDS6.6		<p>Signpost to SDM9:</p> <p><i>1. Cultural, tourist and leisure facilities within Sandwell will, wherever possible, be protected, enhanced and expanded (where appropriate) in partnership with key delivery partners and stakeholders (see Policy SDM9).</i></p> <p>Amend policy to make clear the position where a facility becomes redundant to the current user:</p> <p><i>6. Development that would lead to the loss of an existing cultural / tourism facility in Sandwell will be resisted unless:</i></p> <p><i>...</i></p> <p><i>c. An appropriate contribution is made to support and sustain an alternative local cultural, tourist or leisure facility;</i></p> <p><u><i>d) In cases where an established community or cultural facility is declared redundant, prior to considering any application for its change of use or redevelopment the Council will require robust evidence to be submitted that demonstrates the owners / occupiers have sought to retain it in its current or a very similar use. This could vary depending on the nature of the use but might typically include evidence of the</i></u></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

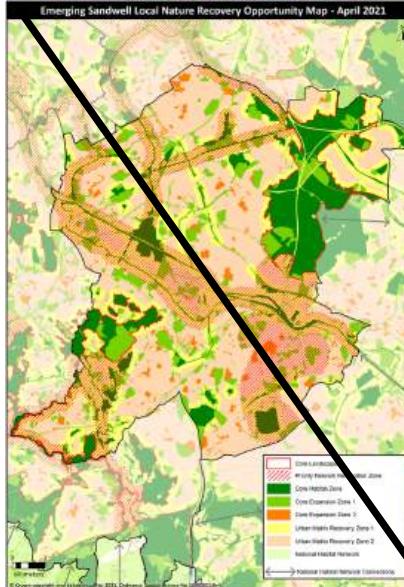
Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<i>marketing of the facility over a 6 – 12-month period for its current use (depending on the nature or complexity of that use or the facility).</i>		
	SDS6.14	<p>Amend text:</p> <p>14. In cases where new development could potentially prejudice the successful ongoing operation of an adjacent cultural/religious / performance venue, the agents of change principle will be applied⁵³. <u>This will be supported by a general presumption against the loss of such facilities unless the parameters set out in Section 6 can be met.</u></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM11	SDS7	<p>Amend policy to say that in decision-taking the Council will apply national policy:</p> <p><i>SDS7 – Sandwell's Green Belt</i></p> <ol style="list-style-type: none"> 1. Sandwell Council will maintain a defensible boundary¹ around the Sandwell green belt, to help promote urban renaissance, to maximise its role in helping to mitigate climate change impacts and to support easy access to the countryside for residents. 2. Sandwell green belt's nature conservation, landscape, heritage and agricultural value will be protected and enhanced. 3. Opportunities will be taken to improve the value and recreational role of the green belt in Sandwell Valley: <ol style="list-style-type: none"> a. through improving safe accessibility for all users; b. by providing facilities for active and passive recreation (if this preserves the openness of the Green Belt and does not conflict with the purposes of including land within it²); c. by protecting tranquil areas and locations with ecological and historic value. 4. Extensions to existing buildings, the re-use of buildings or limited infilling / redevelopment / replacement of them within the footprint of an existing developed site within Sandwell's Green Belt will be considered for approval provided: <ol style="list-style-type: none"> a. extensions are not disproportionately over and above the size of the existing building(s) as originally constructed; b. for replacement buildings, the new building is in the same use and not materially larger than the one it replaces; 	Remove duplication of national guidance and policy.	No – the proposed modification relates to removal of duplication of national guidance and policy and does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
	Paragraph 3.99	<p><i>c. the scale, materials and general design of the proposed development or redevelopment are in keeping with the character of the buildings and their surroundings and avoid greater impact and harm to the openness of the Green Belt; and</i></p> <p><i>d. it does not lead to an increase in the developed proportion of the overall site.</i></p> <p><u>3. In determining planning applications, the Council will apply national policy either in the NPPF or its successor.</u></p> <p>...</p> <p><i>*Provided they are of permanent and substantial construction.</i></p> <p>Amend justification to support the revised policy:</p> <p><i>Justification</i></p> <p>...</p> <p><u>3.99 In accordance with the implementation arrangements set out in the NPPF published on 12 December 2024 (revised 7 February 2025), this plan was examined under the relevant previous version of the NPPF dated December 2023. However, for decision-making purposes, the NPPF (2024) paragraphs 231 – 233 states that policies within the 2024 framework are material considerations in dealing with applications.</u></p> <p><i>3.96 Sandwell Council recognises that the space needs of existing uses can change and evolve over time and some activities may require additional space. To remain in their current premises and to support a thriving community and economy, facilities currently located in the green belt may need to extend or alter their current operational buildings.</i></p> <p><i>3.97 To ensure the openness of the green belt is maintained, any extensions or alterations to buildings in it must not result in additions that are disproportionately over and above the size of the original building. For all non-residential buildings, the 'original building' is taken to be a building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.</i></p> <p><u>3.100 3.98 While green belt is not itself a reflection ...</u></p> <p>Amend text:</p> <p><u>3.99 3.101 Consultants were commissioned by the Black Country authorities to complete a study of the sub-region's green belt in 2019. The study divided the green belt into different parcels based upon common features. It assessed each parcel against the five purposes of the green belt set out in the NPPF and reached conclusions on the level of harm that would occur if land were released for development. It is the Council's view that there are no exceptional circumstances in Sandwell that would justify amending current boundaries and releasing any areas of green belt for new development. While there is an</u></p>		

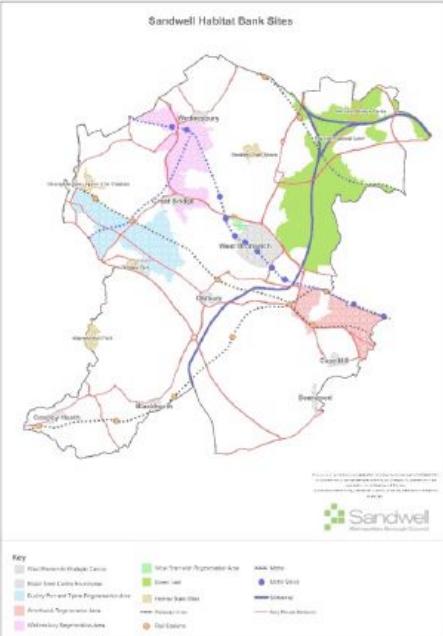
Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<i>identified shortfall of land suitable for housing and economic development, this of itself does not outweigh the need to maintain the openness and permanence of the green belt within Sandwell, especially given the densely developed and urban character of the rest of the borough.</i>		
MM12	Paragraph 4.3	<p>Correct paragraph number from 4.3 to <u>4.4</u>. Consequential renumbering throughout chapter.</p> <p>Explain the use of the 15km impact zone created as a response to the requirements of the Habitats Regulations:</p> <p><u>4.4 Development in Sandwell ...</u></p> <p>...</p> <ul style="list-style-type: none"> ensuring that developments adjacent to canals and natural watercourses deliver improved and extended corridors for the movement of wildlife and people. <p><u>4.5 A report was commissioned by a group of local authorities in the region (including Sandwell and the other Black Country councils) to gauge the potential impacts of development on the region's Special Areas of Conservation, in relation to likely impacts on air quality. This resulted in the carrying out of an Appropriate Assessment on plans and proposals during the drafting of the Sandwell Local Plan, which itself formed part of the assessment.</u></p> <p><u>4.6 During the production of the report, changes were made to the Nitrogen Deposition Critical Load Ranges in the UK's Air Pollution Information System (APIS). The work being undertaken was based on the old Nitrogen Deposition Critical Load Ranges in APIS. Natural England advised that any local plan currently at Regulation 19 stage could continue using the old critical load ranges, but that acknowledgement should be made of the changes in critical loads since the air quality was modelled. For plans at other stages, councils were informed that they should ensure their local plans reflected the current critical load ranges in APIS. The work in question, the Assessment of Air Quality Impacts European Sites in Staffordshire, Wolverhampton, Walsall, Sandwell, and Dudley Report should be updated to reflect the changes in the figures.</u></p> <p><u>4.7 Criterion 1 of Policy SNE1 ensures that where development (alone or in combination with other separate development proposals) may have an adverse impact on sites of European importance, it undergoes an appropriate assessment. This will be in the form of a Habitats Regulation Assessment (HRA). The purpose of a HRA is to determine if a plan or project would affect the protected features of certain habitat sites, such as Special Areas of Conservation (SAC), Special Protection Areas (SPA) or Ramsar sites.</u></p> <p><u>4.8 While Sandwell does not itself contain any European sites, it does lie close to several SACs and just outside the 15km zone of influence of Cannock Chase, also a SAC. As a result, the Council undertook work through the HRA for the Sandwell Local Plan, and with the Cannock Chase SAC Partnership, to ensure</u></p>	<p>Drafting error</p> <p>Clarification and amendment following examination</p>	No – the proposed modification provides clarity on the process undertaken to inform the HRA process (reported upon in the 2024 Submission HRA report) and does not have an implication to the findings of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p><i><u>that the SLP (alone or in combination) would not have adverse impacts on European sites in the vicinity or further afield.</u></i></p> <p>Subsequent paragraphs renumbered.</p>		
SNE1.3		<p>Amend wording:</p> <p><i>3. Species <u>and habitats</u> that are legally protected ...</i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
SNE1.4		<p>Amend wording:</p> <p><i>... a local nature conservation site (Sites of Local Importance for Nature Conservation), <u>protected or priority</u> species, habitat, or geological feature damage must be minimised ...</i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
SNE1.5		<p>Amend criterion 5 to reflect the importance of enhancements to wildlife corridors:</p> <p><i>Developers must take account of the Local Nature Recovery Strategy (Policy SNE2) when preparing their schemes and should plan for the maintenance and where possible enhancement of such linkages. <u>Areas identified on the Sandwell Policies Map as wildlife corridors will be particularly suitable for enhancement and protection, and this will be required when planning proposals are brought forward that would affect them. Where such sites also fall within the West Midlands LNRs in areas of strategic significance a 15% uplift in the value of biodiversity net gain units located within them will also apply.</u></i></p>	Clarification and update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
SNE1.7		<p>Amend criterion 7 to acknowledge that the ecological value of habitat sites may change over time:</p> <p><i>... and will amend existing designations in accordance with this evidence. Consequently, sites may receive new or increased, <u>amended levels of</u> protection over the Plan period, <u>including occasionally their de-designation as a SINC or SLINC.</u></i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a

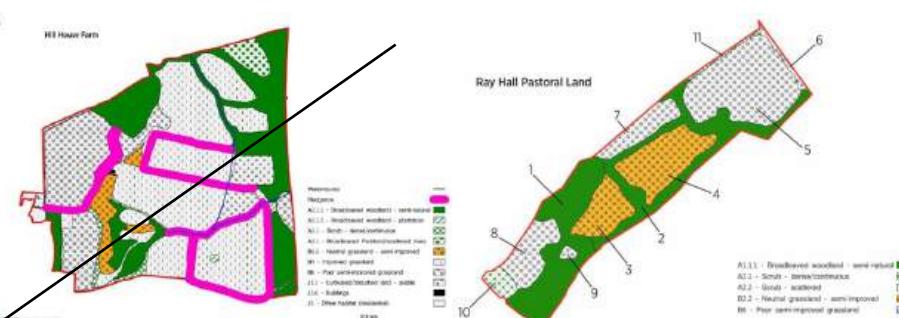
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				change to the conclusions of the HRA.
Paragraph 4.5	Update text: <i>... development proposals should incorporate the recommendations from the Black Country <u>West Midlands</u> Local Nature Recovery Strategy Opportunity Map ...</i>		update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
Paragraph 4.7	Amend wording: <i>4.7 Development offers an opportunity to improve the local <u>ecological and geological</u> environment, and this is especially so in an urban area.</i> Update and amend text: <i>... will identify, map, and regularly review the priorities for protection and improvement throughout the Black Country, in accordance with the emerging Black Country <u>Local</u> Nature Recovery Network <u>Strategy</u>. These will be used to inform planning decisions. <u>As set out in criterion 4, where the planning merits of a proposed development have the potential to outweigh the ecological, geological or environmental value of a SLINC, any suggested mitigation strategy for its loss or partial loss will need to be based on a clear understanding of the current value of the site, using up-to-date evidence.</u> The Local Environmental Records Centre ...</i>		Update and clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
Paragraph 4.9	Add new paragraph, renumber as necessary: <u>Potential Sites of Importance</u> <i>4.9 Potential Sites of Importance (PSIs) are areas that may support notable species, valuable semi-natural habitats, or important geological features but that have not yet been formally assessed against local wildlife and geological sites selection criteria. These sites are identified using aerial photography, historic mapping, existing environmental records, and local knowledge and EcoRecord holds details of their locations. PSIs are often undeveloped or semi-natural areas that contribute to local ecological networks by providing habitat, supporting biodiversity, and offering opportunities for restoration and enhancement. They play an important role in delivering Local Nature Recovery Strategy objectives and wider national biodiversity goals.</i>		Clarification and explanation	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

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		<p>4.10 Where a planning application is likely to have an impact on a PSI, the potential effects on its ecological or geological value must be assessed. If effects are identified, appropriate mitigation or compensation measures will be sought where appropriate. Undertaking a Local Site assessment at the pre-application stage may help determine whether the site meets the criteria for designation.</p> <p>Protection and Enhancement of Wildlife Habitats</p> <p>4.9 4.11 The Environment Act (2021) ...</p>		
MM13	Figure 1 Appendix A	<p>Figure 1 of Appendix A will be replaced with a link to the West Midlands Local Nature Recovery Strategy map on the WMCA website.</p> <p>[see also AM21]</p> <p>Figure 1 - Sandwell Nature Recovery Network map</p> 	Update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
MM14	Appendix A, Figure 2	<p>Figure 2 of Appendix A (now revised Figure 1) amended to identify those habitat banks identified in Policy SNE2 only.</p> <p><i>The following map identifies the list of sites that were ranked by the consultants as being of high and medium value for BNG improvements and are identified as habitat banks.</i></p> <p>Amend habitat bank mapping for Menzies Open Space, Tibbington Open Space and Tividale Park to clarify areas currently in use as or identified as playing pitches.</p> <p>Clarify supporting text in Appendix A as follows:</p> <p><i>Exclusion of certain open space typologies from consideration – allotments, cemeteries and churchyards, institutional land (schools, hospitals, sports grounds and reservoirs), outdoor sports facilities (including playing pitches) and provision for children and young people.</i></p> <p>Amend title of (revised) Figure 1:</p> <p><u>Figure 1 - Location of Sandwell habitat bank sites</u></p>	Clarification and update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		 <p>The map displays the locations of various habitat bank sites in Sandwell, including the West Bromwich, Oldbury, and Smethwick areas. The sites are color-coded according to the key below, representing different ecological zones and areas of interest.</p> <p>Key:</p> <ul style="list-style-type: none"> Macmillan Multiple Choice Urban Green Corridor Existing Potent Type Protection Area Amendment Protection Area Delivery Segmentation Area Green Land Former Green Land Former Biodiversity Former in use Urban Key Points 		
MM15	SNE2.1	<p>Amend wording:</p> <ol style="list-style-type: none"> 1. <u>All Development proposals in Sandwell shall deliver a minimum 10% net gain in biodiversity value... Where achievable, a higher net gain may be agreed. Losses and gains will be calculated using the extant national Biodiversity Metric. – Proposals that offer more than 10% BNG on development sites will be welcomed and the additional ecological value will be considered positively when a decision is made on the relevant planning application.</u> <p><u>x Subject to exemptions set out in national guidance</u></p>	Clarification and correction	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?				
	Paragraph 4.14	<p>Explain modification to Policy SNE2.1 in supporting text:</p> <p>Include explanatory paragraph after 4.14 on the clearance of sites prior to the submission of a planning application:</p> <p><i>4.14 ...and an estimation of how proposed designs will add to that current level, supported by evidence that a minimum 10% net gain has been delivered. Where a development proposal is designed in such a way that more than 10% BNG will be delivered, the Council will look favourably on this higher provision, in particular where it addresses other policy objectives and helps to meet the wider aims of the Local Nature Recovery Strategy such as strengthening ecological networks and creating stepping stone sites between larger green areas.</i></p> <p><i>4.15 The government have established the date of 30th January 2020 as a baseline for the assessment of BNG. Any site clearance that occurs after this date that is not related to the grant of planning permission will have its BNG measured against what was on site at the baseline date, using historic records, aerial imagery, habitat data and other relevant information. The baseline ecological value is also taken as being at a level commensurate with the most important or sensitive ecological records applying to the site, as part of a precautionary approach. This means that the level of BNG required to be delivered would be at the highest level possible for that site.</i></p>	Clarification and update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.				
	SNE2.2	<p>Amend text:</p> <p><i>... 2. Biodiversity net gain must be provided in line with the following principles^(x): ...</i></p> <p><i>(x) See also Paragraph: 008 Reference ID: 74-008-20240214 of the national Biodiversity Net Gain guidance</i></p>	Clarification of BNG hierarchy	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.				
	SNE2.6	<p>Amend text:</p> <p><i>Sandwell Council has identified the following site(s)⁶⁵ as suitable for the provision of biodiversity units to developers unable to provide a minimum 10% net gain on their own sites (see Appendix A and evidence base):</i></p> <p>Amend table of sites:</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Potential project types</th> <th>Baseline units</th> <th>Potential uplift units (%)</th> </tr> </thead> </table>	Location	Potential project types	Baseline units	Potential uplift units (%)	Update Consistent approach and consequent changes throughout SLP	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
Location	Potential project types	Baseline units	Potential uplift units (%)					

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p>Hill House Farm Ray Hall Pastoral Land</p> <p><i>Large areas of 'modified grassland' within the site that could be improved to 'other neutral grassland' of good condition. The current land use may have to be adapted to accommodate these changes (arable).</i></p> <p><i>There is potential for uplift in other habitats on site. Comprises an area of natural and semi-natural greenspace containing several fields of pastures divided by hedgerows with trees. Ray Hall Pastoral Land contains pockets of poor and moderate 'other neutral grassland' which is divided by woodland and scrub. The grassland and woodland habitats offer the most potential for uplift.</i></p> <p>NB – Ray Hall pastoral land and Hill Farm Bridge Fields will be treated as a single site.</p>	<p>241.73 87.75</p> <p>+255.87 (105.85) +48.05 (54.76)</p>	
	SNE2.8	<p>Amend accompanying plans (Appendix A):</p> <p>Delete plan of Hill House Farm, replace with one of Ray Hall pastoral land</p>  <p>For consistency, refer to the six sites as "<u>habitat banks</u>" throughout the SLP and on the Policies Map</p> <p>Amend text:</p> <p><i>Priority locations for habitat creation and enhancement are as shown on the Sandwell <u>West Midlands</u> Local Nature Recovery Strategy map (Appendix A). Development sites within <u>areas of particular importance for biodiversity</u></i></p>	<p>Update and consequential change following</p>	<p>No – the proposed modification relates to points of clarity and does not trigger a</p>

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
	Paragraph 4.35	<p><i>the identified zones will be expected to contribute towards the creation of appropriate habitat linkages and types to support those priority areas.</i></p> <p><i>x https://www.wmca.org.uk/what-we-do/environment-energy/west-midlands-local-nature-recovery-strategy/</i></p>	deletion of Sandwell LNRS plan [MM14]	change to the conclusions of the HRA.
		<p>Amend text to reflect updated position:</p> <p><i>4.35 The Local Nature Recovery Strategy Nature Recovery Network Map for Sandwell (April 2021) is shown at Appendix A alongside a description of the components that make it up. This, together with similar strategies for the other three Black Country councils, will eventually forms an integral part of a wider the West Midlands LNRS that is to be has been produced in the future by the West Midlands Combined Authority. In the meantime, it will carry weight as evidence supporting Policy SNE2. A detailed map showing the various LNRS opportunities and objectives as they apply to Sandwell can be viewed on the WMCA website^a</i></p> <p><i>^a https://www.wmca.org.uk/what-we-do/environment-energy/west-midlands-local-nature-recovery-strategy/</i></p>	Update	No – the proposed modification relates to an update in relation the LNRS and does not trigger a change to the conclusions of the HRA.
MM16	SNE3.1	<p>Move tree replacement requirements to form the first section of the policy. Move criteria 5, 12, 13, 14 to the new section as follows, renumber other criteria as necessary. Make any consequential changes as required.</p> <p><u>Tree Replacement</u></p> <p><i>1. Development schemes that involve the removal of trees must ensure suitable replacement trees are provided onsite. Where sufficient suitable onsite replacements cannot be provided, off-site planting or woodland enhancement, including support for natural regeneration, in the near vicinity of the removed tree(s) must be provided, in line with the mitigation hierarchy set out in Policy SNE2 (criterion 7b).</i></p> <p><i>2. For every tree to be removed from a development site, a minimum of three replacement trees will be required to be planted, in accordance with the Council's aim to increase tree canopy cover across the district by 6% and to ensure that the minimum requirement of 10% biodiversity net gain is met and preferably exceeded.</i></p> <p><i>3. The species, eventual size and amenity value of replacement trees must be commensurate with the size, stature, rarity, and / or public amenity of the tree(s) to be removed. Where trees to be replaced form a group of amenity value (rather than individual specimens), replacements must also be in the form of a group commensurate with the area covered, size and species of trees and established quality of the original group. Where possible, they must be planted in a position that will mitigate the loss of visual amenity associated with the original group.</i></p>	Clarification and accessibility	No – the proposed modification relates to points of clarity and structure and does not trigger a change to the conclusions of the HRA.

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		<p><u>4. Replacement trees must not be planted in locations where they would impact on sites identified / designated as ecologically important (see also Policy SNE2(4)) unless this has been specifically agreed with the Council.</u></p> <p><i>Retention and Protection of ancient woodland and veteran or ancient trees</i></p> <p><u>5. 4. Development that would ...</u></p>		
	SNE3.1	<p>Amend wording to clarify the Council's position on irreplaceable habitats such as ancient and veteran trees:</p> <p><i>Development that would result in the loss of or damage to ancient woodland and / or ancient or veteran trees will not be permitted be refused unless wholly exceptional reasons to allow it and a suitable compensation strategy both exist.</i></p>	Alignment with NPPF paragraph 106c	No – the proposed modification relates to updates to reflect the NPPF and does not trigger a change to the conclusions of the HRA.
	SNE3.2 Paragraph 4.62	<p>Remove reference to 50m buffer depth:</p> <p><i>Development adjacent to ancient woodland and / or groups of ancient or veteran trees will be required to provide an appropriate landscaping buffer, with a minimum depth of 15m and a preferred depth of 50m.</i></p> <p>Amend reference to Natural England / Forestry Commission joint advice:</p> <p><i>Ancient woodland and veteran trees⁸⁸</i></p> <p><i>4.62 The NPPF defines ancient woodland and veteran trees as an irreplaceable habitat. Ancient woodland is an area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites. ... given the length of time the trees have been successfully established. Natural England and the Forestry Commission have issued joint advice on how to assess a planning application that may have an impact on ancient woodland, ancient trees or veteran trees standing near to or on a development site⁸⁸.</i></p> <p>⁸⁸https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</p>	Correction and clarification	No – the proposed modification relates to correction and points of clarity and does not trigger a change to the conclusions of the HRA.
MM17	SNE4 paragraph 4.73	<p>Amend text to explain potential overlap between geological and historic importance / significance:</p> <p><i>4.73 ... In many cases they also form an intrinsic part of the green infrastructure network, contributing to landscape and ecological diversity as part of the wider natural environment. Geological and historic significance are closely linked elements of Sandwell's environmental and cultural heritage. Geological significance relates to</i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a

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		<p><i>features such as rock strata, landforms, and mineral seams that reveal the area's natural history and contribute to the character of the Black Country UNESCO Global Geopark. Historic significance, as addressed in Policy SHE4, refers to archaeological remains and historic landscapes that record past human activity and cultural development.</i></p> <p><i>4.74 These forms of significance often overlap. The borough's geology has shaped patterns of settlement, building materials, and industrial growth, while many historic and archaeological sites expose or incorporate geological features such as former quarries, mines, and cuttings. Likewise, geological landforms frequently define the setting and visual context of heritage assets.</i></p> <p>Renumber following paragraphs accordingly</p>		change to the conclusions of the HRA.
MM18	SNE6.1	<p>Amend text:</p> <p>1. Sandwell's canal network (<i>see Figure 14</i>) comprises the canals and their surrounding landscape ...</p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM19	SHE1	<p>Change title of section and policy:</p> <p><i>Listed Buildings and Conservation Areas Heritage Assets</i></p> <p>...</p> <p><i>Policy SHE1 – Listed Buildings and Conservation Areas Heritage Assets</i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SHE1.3	<p>Amend wording to make it clear when a heritage assessment will be required and for which types of development:</p> <p><i>All proposals Planning applications for development that may affect a heritage asset (designated or non-designated), or its setting must be accompanied by a Heritage Impact Assessment. Proposals likely to require an assessment may include (but not be limited to) the following:</i></p> <ul style="list-style-type: none"> <i>Extension or alteration to, or demolition (full or partial) of, a listed building</i> <i>New development within a conservation area</i> 	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<ul style="list-style-type: none"> • <u>Development adjacent to or within the setting of a heritage asset</u> • <u>Changes in land use that could affect a heritage asset</u> • <u>Infrastructure projects (roads, pipelines, utilities) crossing or adjacent to heritage-rich areas</u> • <u>Major developments likely to impact archaeology or historic landscapes</u> <p># <u>They</u> should set out clearly the significance of the heritage asset, including any contribution made by its setting, ...</p>		conclusions of the HRA.
	SHE1.4	<p>Amend text:</p> <p>... Sandwell Council will seek to conserve and enhance the settings of listed buildings <u>preserve the significance of a listed buildings or its setting</u>...</p>	Correct nomenclature	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM20	SHE2.3	<p>Amend text:</p> <p>3. <u>All</u> Heritage assets that contribute positively to the local character ...</p>	Clarify focus	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM21	SHE3	<p>Change title of section and policy:</p> <p><u>Locally Listed Buildings Non-Designated Heritage Assets</u></p> <p>...</p> <p><u>Policy SHE2 – Locally Listed Buildings Non-Designated Heritage Assets</u></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
	SHE3.2	Amend text: 2. <i>Demolition of locally listed buildings will be resisted unless it can be demonstrated that no viable use can be found for the building or that the proposed development will have a substantial public benefit material considerations indicate otherwise.</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM22	SHE4.3	Amend text: ... likely to have a significant adverse impact on <u>harm</u> designated archaeological assets...	Correct nomenclature	No – the proposed modification relates to a corrections and does not trigger a change to the conclusions of the HRA.
MM23	SCC1	Rename policy: <i>Policy SCC1 - Energy Infrastructure <u>Reducing operational carbon in new build residential development.</u></i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SCC1	Amend first line of policy text: <i>An energy statement will be required for All new build dwellings (use class C3 and C4), are required to submit an energy statement demonstrating that the development meets the requirements set out in the following sections.</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

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	SCC1.3	<p>Restructure section 3:</p> <p>... b. Major developments (residential development of ten or more dwellings) should include an assessment of decentralised energy networks within the Energy Statement:</p> <p><i>C.1. This assessment should outline existing or planned decentralised energy networks in the vicinity of the development and should assess the opportunity to connect to them.</i></p> <p><i>D.2. Where there is an existing or imminently planned network, the general expectation to pursue a connection may be waived if it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised energy networks, or that an individualised solution would result in lower overall carbon emissions than connecting to the decentralised network, taking into account that network's carbon emissions factors.</i></p> <p><i>C.3. For developments of over 100 dwellings ...</i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SCC1.5a	<p>Amend text:</p> <p>Footnote 116:</p> <p><i>Exceptional circumstances where the renewable electricity target (as 39% of regulated energy use) is not achieved may only be found acceptable in some cases, for example with taller flatted buildings (four-4 storeys or above) or where overshadowing significantly impacts solar PV output, or where grid capacity or connection can be demonstrated to be unfeasible.</i></p>	Clarification of exceptional circumstances	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SCC1 paragraph 5.32	<p>Amend text:</p> <p><i>These are processes to follow throughout design, construction, commissioning and building handover that reduce the energy performance gap (the gap between predicted energy use and actual energy use). These processes aim to minimise a building's actual carbon emissions (as opposed to predicted emissions using less precise methods like SAP) and enhance occupant satisfaction. not only help keep the building's actual carbon emissions to a minimum (as opposed to their predicted emissions using inaccurate methods like SAP), but they also help to ensure occupant satisfaction. Examples of Suitable methods include BSRIA Soft Landings¹¹⁹, NEF / GHA Assured Performance Process¹²⁰, and Passivhaus certification. Alternative processes proposed by the applicant will also be considered, provided they demonstrate evidence-based merit and meet the same objectives. Other processes may be available or become available during the course of the plan. Alternative processes proposed by the applicant will be subject to consideration by the Council on their evidence-based merits. There are also some</i></p>	Clarification and further justification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

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		<p>aAdditional tools, such as BS40101^x are available <u>to support improvements in energy performance but that are not in themselves an assured performance processes, but that can assist in improving the energy performance of a building in use, such as BS40101121. Other methods may emerge over the course of the plan period and will also be considered.</u></p> <p>^x https://building-performance.network/advocacy/british-standard-bs40101-launch</p>		
MM24	SCC2.4d	<p>Correction:</p> <p><i>Large-scale development (≥5000m² floorspace) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual dwellings buildings), such as solar PV canopies on car parks, have been explored.</i></p>	Correction	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM25	SCC3	<p>Amend text:</p> <p><i>5.56 Certain aspects of building design intended to increase energy efficiency and reduce heat demand, such as increased glazing and airtightness, can also exacerbate heat risk and cause uncomfortable living conditions. <u>The inclusion of CIBSE TM52/59 overheating assessments provides the flexibility needed to manage this balance, as these assessments allow for more detailed design solutions compared to the simplified approach in Part O of Building Regulations.</u></i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM26	SCC4	<p>Amend SSC4.1(a) - Embodied carbon reporting:</p> <p><i>All large-scale major new residential developments (50 dwellings or more) and non-residential developments (5,000 m² floorspace or more) developments are required to complete a whole-life carbon assessment in accordance with RICS Whole Life Carbon Assessment guidance with BS EN 15978 standard. The assessment should be based on the most appropriate and up-to-date guidance available that complies with the principles outlined in the BS EN 15978 standard. Guidance such as the RICS Whole Life Carbon Assessment guidance (2nd edition) may be used, among others.</i></p> <p>Amend SSC4.4(a) Demolition audits:</p> <p><i>a. All major development sites that contain existing buildings / structures must carry out a pre-redevelopment and/or pre-demolition audit, following a well-established industry best practice method (e.g. BRE), for larger structures or significant demolitions.</i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

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		<i>b. For smaller-scale demolitions, such as individual walls or small outbuildings, developers are required to consider material re-use where feasible, without the need for a full audit. A simplified, proportionate approach should be taken to assess potential material recovery and reuse.</i>		
MM27	SCC5.1a	Amend text: <i>1. Flood Risk</i> <i>a. All developments are required to provide information on the site-specific flood risk of the development site undertake a site-specific flood risk assessment including:</i>	It is not intended that all developments will be required to provide a full flood risk assessment in accordance with national guidance - minor modification to the wording of the policy	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
		Amend text: <i>6. Watercourses and flood mitigation</i> <i>a. Watercourses (including canals) are an integral part of Sandwell ...</i>	Clarify scope	No – the proposed modification relates to points of clarity and scope and does not trigger a change to the conclusions of the HRA.
	SCC5.6.a.iii	Amend text:	Correction	No – the proposed modification relates to

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<i>Not developing over culverted watercourses and allowing a suitable <u>distance easement</u> from the outside edge of the culvert.</i>		a correction and does not trigger a change to the conclusions of the HRA.
	SCC5	<p>New criterion 7:</p> <p><u>7. All developments should seek to provide wider betterment by demonstrating in site-specific flood risk assessments and surface water drainage strategies (where required) what measures can be put in place to contribute to a reduction in overall flood risk downstream. This may be by:</u></p> <p class="list-item-l1">a. <u>provision of additional storage on site e.g., through oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors; and/or</u></p> <p class="list-item-l1">b. <u>by providing a partnership funding contribution towards wider community schemes (both within and beyond the Black Country, in shared catchments with Southern Staffordshire and Birmingham).</u></p> <p>...</p>	Reintroduce part 15 from Regulation 18 SLP – request from statutory consultee following omission	No – the proposed modification relates to an update to satisfy the statutory consultee and does not trigger a change to the conclusions of the HRA.
MM28	SCC6.1a	<p>Amend text:</p> <p>1. Sustainable Drainage Systems</p> <p>a. <u>Unless it is not practicable to do so, all development proposals</u> should demonstrate that the design has incorporated sustainable drainage systems ...</p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	Paragraph after 5.78	<p>Add supporting text to explain how practicability will be judged:</p> <p><u>In assessing whether the use of SuDS is practicable, consideration will be given to the specific characteristics of the site, the nature of the proposed development, and the opportunities available to integrate drainage solutions as part of the overall design. Practicability will not be judged solely on cost or convenience. Instead, the assessment will consider whether there are significant technical, environmental, or operational constraints that would prevent SuDS from functioning effectively or being maintained over the long term. Factors that may influence the practicability of SuDS include:</u></p> <ul style="list-style-type: none"> • <u>Site conditions, such as soil type, permeability, groundwater levels, contamination, or land stability, which may limit infiltration or the ability to manage surface water on site.</u> 	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

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		<ul style="list-style-type: none"> • <u>Physical constraints, including site layout, topography, or the presence of existing utilities or infrastructure.</u> • <u>Design considerations, such as the need to ensure safety, structural integrity, or the delivery of other essential development components.</u> <p><u>Where SuDS are not considered practicable, applicants will be expected to provide robust evidence and justification, supported by relevant technical assessments. In such cases, alternative surface water drainage solutions must still seek to achieve the same objectives of managing runoff close to source, improving water quality, and reducing flood risk, wherever possible.</u></p>		
MM29	SHW1	<p>Rename policy:</p> <p><i>Policy SHW1 – Health Impacts Assessments</i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SHW1.1	<p>Create new criterion 1.3 from existing text and renumber following criteria accordingly:</p> <ol style="list-style-type: none"> 1. ... e. any other development that the Council considers has the potential to impact on public health. 2. Such development will only be permitted where it is demonstrated that it will not, in isolation or in conjunction with other planned, committed or completed development, contribute to a negative impact on the health of the borough's population. <p><u>23. To ensure that new developments have a positive impact ...</u></p> <p>Delete criterion 4</p> <ol style="list-style-type: none"> 4. <u>Where the development of a new shop is acceptable in principle under other policies, planning permission will only be granted where a condition can be imposed that prevents the subsequent establishment of a stand alone off licence without the need to apply for planning permission where there is evidence of existing alcohol drinking establishments contributing to existing negative health and wellbeing impacts and patterns of anti-social behaviour.</u> 	Clarification and correction	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	Paragraph 6.13	<p>Amend text:</p> <p><u>6.13 Proposals for major development, or other proposals with the potential to generate negative effects on the mental and physical health and wellbeing of communities, should provide an assessment of their potential impacts</u></p>	Clarification and	No – the proposed modification relates to points of clarity and

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		<p>through the use of health impact assessments, as set out in the policy. <u>For the purposes of the assessment process, a waste facility is considered "major" if it accepts more than 75,000 tonnes of non-hazardous waste or 100,000 tonnes of hazardous waste per year. Supporting information should be provided in accordance with guidance set out in Policy SWA4.</u></p> <p><u>6.14 Criterion 1 of the policy provides broad parameters on what forms of development will need to be assessed. Criterion 3 relates to those developments identified under criterion 1 and sets out what level of health assessment will be required.</u></p> <p><u>6.1415 Such an assessment should address ...</u></p>	explanation of approach	does not trigger a change to the conclusions of the HRA.
	Paragraph 6.19	<p>Delete text:</p> <p>6.19 Shop uses currently fall within Class E – Commercial, Business and Service of the Town and Country Planning (Use Classes) Order 1987 (as amended) and therefore any condition preventing the subsequent establishment of a stand alone off licence would apply to any permission within Class E or any successor use class should there be changes within the lifetime of the plan.</p>	Consequential to deletion of criterion 4 of Policy SHW1	No – the proposed modification relates to a deletion which does not trigger a change to the conclusions of the HRA.
MM30	SHW2.2	<p>Amend wording:</p> <p>... New or improved healthcare facilities, <u>infrastructure</u> and services will be provided ...</p>	Clarify flexibility	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SHW2.3	<p>Delete references to Local Development Documents:</p> <p><i>Proposals for major residential developments of ten units or more must be assessed against the capacity of existing healthcare facilities, <u>infrastructure</u> and / or services as set out in local development documents. Where the demand generated by the residents of the new development would have unacceptable impacts upon the capacity of these facilities, <u>services and / or infrastructure</u>, developers will be required to contribute to the provision or improvement of <u>them</u> such services, in line with the requirements and calculation methods set out in local development documents.</i></p>	Correction	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

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	SHW2.6	<p>Delete wording:</p> <p><i>6. The effects of the obligations on the financial viability of development may be a relevant consideration.</i></p>	Consistency	No – the proposed modification relates to a deletion which does not trigger a change to the conclusions of the HRA.
MM31	Paragraphs 6.36 to 6.39	<p>Amend text:</p> <p><i>6.36 ... Sandwell Council is working to reduce pollutant concentrations and to minimise exposure to air quality that does not meet with national objectives. Like the other Black Country Councils, it has declared <u>an</u> Air Quality Management Areas to try to address the issue of poor air quality and provide protection for human health.</i></p> <p><u>6.37 As part of this, an Air Quality Action Plan has been produced and updated, which sets out how the Council are monitoring and addressing air quality issues around vehicles, industrial emissions and smoke control. In general, monitoring over recent years has demonstrated that the levels of air pollution across the borough have fallen, in line with wider national trends. If this continues, the Sandwell-wide Air Quality Management Area may be lifted during the lifetime of this plan.</u></p> <p>Amend references to Black Country Air Quality supplementary planning document in this policy and consequentially throughout the SLP:</p> <p><u>6.37 6.38 ...Most developments will have a moderate air quality impact, which can be dealt with through standard mitigation measures, without the need for an Air Quality Assessment (AQA), as detailed in the Black Country Air Quality SPD. ... a wide area. The West Midlands Combined Authority is responsible for producing further air quality planning guidance and where appropriate this may provide further advice and guidance. This will effectively replace the previous Black Country Air Quality SPD.</u></p> <p><u>6.38 6.39 AQAs should be proportionate to the type and scale of development proposed, in accordance with the guidance provided by the Black Country Air Quality Supplementary Planning Document and relevant national standards for air quality and local guidance as appropriate ...</u></p> <p><u>6.39 6.40... An appropriate methodology informed by the Black Country Air Quality SPD <u>national and where appropriate regional guidance</u> should be agreed with the relevant development management team / <u>planning</u> officer on a case-by-case basis.</u></p>	Update and clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA. The air quality action plan specifically refers to human health with no implications for the HRA process.

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MM32	SHW4.2	<p>Correct figure:</p> <p><i>2. On new housing sites of 2ha or over, Sandwell Council will seek the provision of new unrestricted open space at a minimum ratio of 3.258 <u>3.235</u> hectares of space per 1,000 population. This open space will be provided on site.</i></p>	Correction / update to reflect change in open space provision following removal of two open spaces sites from the policies map	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SHW4 7bi	<p>Correct figure:</p> <p><i>... following the loss of the open space, the amount of unrestricted open space at ward level would exceed 3.258 <u>3.235</u> hectares per 1,000 population; and ...</i></p>	Correction / update to reflect change in open space provision following removal of two open spaces sites from the policies map	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	Paragraph 6.51.	<p>Amend text:</p> <p><i>6.51 Open space, and play standards are <u>and</u> requirements are set out in Appendix J-H and will be subject to review as evidence is updated over the Plan period. <u>Where a committed sum or improvements are made towards nearby off-site provision in lieu, prioritisation will be given to existing open space facilities within a 400m walking distance. Where facilities do not exist within walking distance or insufficient improvement works are identified to make the contribution acceptable, priority will be given to open space not within walking distance following the Open Space</u></i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

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		<p><u>Hierarchy presented at Table 1 of Appendix H. Priority will be given to the closest local open spaces in the first instance, then neighbourhood, town and finally borough open spaces.</u></p>																					
	SHW4 Appendix J	<p>Amend text:</p> <p>Correct figure - Appendix J Provision (now Appendix H):</p> <p><i>The Council will seek the provision of unrestricted open space at a minimum ratio of 3.258 3.235 hectares per 1,000 population, measured at a ward level.</i></p> <p>Correct figure - Appendix J (H) Open space standards in Sandwell:</p> <p><i>There are 349 298 open spaces with unrestricted access in Sandwell, covering an area of 1121 1113 hectares. This equates to 13.6 12.9% of the total area of the borough. The quantum of open spaces with unrestricted access equates to 3.258 3.235 hectares of space per 1,000 population.</i></p> <p>Correct figure - Appendix J (H) Table 2:</p> <table border="1"> <thead> <tr> <th>Open Space Typology</th> <th>Area (Ha)</th> <th>Ha per 1,000 population</th> </tr> </thead> <tbody> <tr> <td>Amenity Greenspace</td> <td>188.28 180.10</td> <td>0.547 0.523</td> </tr> <tr> <td>... total</td> <td>1121.58 1113.4</td> <td>3.258 3.234</td> </tr> </tbody> </table> <p>Table 5</p> <table border="1"> <thead> <tr> <th>Open space typology</th> <th>Proposed standard (ha/1000 population)</th> <th>Proposed standard (sqm/person)</th> <th>Rate (per sqm)</th> <th>Contribution per person (£)</th> </tr> </thead> <tbody> <tr> <td>Amenity greenspace</td> <td>0.547 0.523</td> <td>5.3</td> <td>£18.34</td> <td>£97</td> </tr> </tbody> </table> <p>...</p>	Open Space Typology	Area (Ha)	Ha per 1,000 population	Amenity Greenspace	188.28 180.10	0.547 0.523	... total	1121.58 1113.4	3.258 3.234	Open space typology	Proposed standard (ha/1000 population)	Proposed standard (sqm/person)	Rate (per sqm)	Contribution per person (£)	Amenity greenspace	0.547 0.523	5.3	£18.34	£97	Correction following previous incorrect designation for two open space sites and consequential changes	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
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MM33	Paragraph 6.43	<p>Amend footnotes:</p> <p>... whereas Policy SHW5 relates specifically to playing fields^(x) and built sports facilities^(y).</p> <p><u>(x) As identified in The Town and Country Planning (General Development Procedure) (Amendment) Order 1996</u></p> <p><u>(y) A purpose-built structure or venue designed and constructed to accommodate sporting and physical recreation activities. Examples may include, but are not limited to, sports halls, gymnasiums, swimming pools or indoor courts, and their ancillary spaces.</u></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.					
MM34	SHW5 Paragraph 6.57.	<p>Clarify details and use of the Sandwell Playing Pitch and Outdoor Sports Strategy:</p> <p><i>6.57 The current Sandwell Playing Pitch and Outdoor Sports Strategy (PPOSS) action plan identifying the quantitative situation for playing field provision was produced in October 2022. The PPOSS is updated approximately every five years and therefore will be revised during the plan period. Where appropriate, developers will need to demonstrate that they have taken account of the findings of the most recent version of the Sandwell PPOSS in their schemes; this will be the version that will be used by the Council when a decision is made on planning proposals.</i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.					
MM35	SHO1.1	<p>Amend text:</p> <p>1. <i>Sufficient land will be provided to deliver at least 10,434 <u>11,901</u> net new homes over the period 2024-2041. As set out in the NPPF (para 76b), Sandwell Council is seeking to confirm through the SLP the existence of a 5-year housing land supply from the year of adoption (2026). For this purpose, a 20% buffer has been applied to housing supply, in line with the most recent Housing Delivery Test results (2023).</i></p>	Update following EiP	Yes – the proposed modification introduces a change to the housing numbers to reflect additions to sites with planning permission (i.e. committed development),					

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				changes to the windfall allowance and the removal of discounting made in the Submission SLP. This change has been assessed in the Main Modifications HRA Report.																														
SHO1 Table 7	Amend Table 5 (now Table 7):	<table border="1"> <thead> <tr> <th><u>Source of Supply</u></th> <th><u>Type of Supply</u></th> <th><u>2024-2041</u></th> </tr> </thead> <tbody> <tr> <td><u>Current Supply</u></td> <td><u>Site under construction</u></td> <td><u>566</u></td> </tr> <tr> <td></td> <td><u>Sites with Planning Permission or Prior Approval</u></td> <td><u>929</u></td> </tr> <tr> <td></td> <td><u>Site with Other Commitments (as set out in 2024 SHLAA)</u></td> <td><u>70</u></td> </tr> <tr> <td><u>Allocated</u></td> <td><u>Sites without planning permission</u></td> <td><u>6237</u></td> </tr> <tr> <td></td> <td><u>Sites with Planning Permission</u></td> <td><u>1328</u></td> </tr> <tr> <td></td> <td><u>Sites under construction</u></td> <td><u>322</u></td> </tr> <tr> <td colspan="2"><u>Total Identified Sites</u></td><td><u>9452</u></td></tr> <tr> <td><u>Total Windfall Allowance</u></td><td><u>Small sites (<10 homes / 0.25ha) (2028-2041)</u></td><td><u>1547</u></td></tr> <tr> <td colspan="2"><u>Total Identified Sites and windfall allowance</u></td><td><u>10,999</u></td></tr> </tbody> </table>	<u>Source of Supply</u>	<u>Type of Supply</u>	<u>2024-2041</u>	<u>Current Supply</u>	<u>Site under construction</u>	<u>566</u>		<u>Sites with Planning Permission or Prior Approval</u>	<u>929</u>		<u>Site with Other Commitments (as set out in 2024 SHLAA)</u>	<u>70</u>	<u>Allocated</u>	<u>Sites without planning permission</u>	<u>6237</u>		<u>Sites with Planning Permission</u>	<u>1328</u>		<u>Sites under construction</u>	<u>322</u>	<u>Total Identified Sites</u>		<u>9452</u>	<u>Total Windfall Allowance</u>	<u>Small sites (<10 homes / 0.25ha) (2028-2041)</u>	<u>1547</u>	<u>Total Identified Sites and windfall allowance</u>		<u>10,999</u>	Clarification, updating	As above
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<u>Total supply and net completions</u>	<u>11,901</u>																			
SHO1.2	Amend text: <i>The key sources of housing land supply are summarised in Table Z, which also provides an indicative number of homes to be delivered in the following timeframes: 2024–2029, 2029–2034, 2034–2039 and 2039–2041. Strategic housing allocations are set out in Appendix B. Chapter 16 and Non-Strategic housing allocations are set out in Chapter 17.</i>	Update [see also MM2]	As above																	
SHO1.4	Amend text: <i>The development of sites for housing should demonstrate be delivered through a comprehensive approach, making best use of available land and infrastructure and not prejudicing neighbouring uses. Incremental development of an allocated site will only be allowed where it would not prejudice the remaining parts of the site coming forward for development or the delivery of infrastructure. the achievement of high-quality design across the wider site. Masterplans and other planning documents¹⁵⁹ will be produced, where appropriate, ...</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.																	
SHO1	Insert new criterion 5:	Clarification	No – the proposed modification relates to points of clarity and																	

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p><u>5. All new developments should be supported by the necessary on and off-site infrastructure to serve its needs, mitigate its impacts on the environment and the local community, and ensure that it is sustainable and contributes to the proper planning of the wider area.</u></p>		does not trigger a change to the conclusions of the HRA.
SHO1.5		<p>Delete last sentence of current criterion 5 (now renumbered criterion 6):</p> <p><u>5. 6. Ancillary uses appropriate for residential areas, such as health facilities, community facilities and local shops, may be acceptable where there is a gap in service provision and where they can be integrated successfully into the residential environment. Other uses will not be acceptable on these sites.</u></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
Paragraph 7.4		<p>Amend text:</p> <p><u>7.4 The council has identified sufficient land to provide 11,901 additional homes by 2041. The NPPF requires the Council to maintain a five-year supply of housing sites. On adoption of the plan (2026), based on the projected completions in the trajectory (see Appendix G), there is a 5.10 year supply (with a 20% buffer). 97%....</u></p>	Clarification	<p>Yes – the proposed modification introduces a change to the housing numbers to reflect additions to sites with planning permission (i.e. committed development), changes to the windfall allowance and the removal of discounting made in the Submission SLP.</p> <p>This change has been assessed in the Main Modifications HRA Report.</p>

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
	Paragraph 7.5	<p>Amend text:</p> <p><i>The details of proposed housing allocations are provided in Appendix B Chapters 16 and 17 and sites are shown on the Policies Map. Housing capacity has been identified in accordance with the Spatial Strategy and is based on the following information....</i></p>	Clarification and update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	Paragraph 7.6 – 7.9	<p>Delete paragraphs:</p> <p>7.6 The housing supply from allocations on occupied employment land has been discounted by 15% to take account of the multiple delivery constraints that typically affect such sites and that are likely to reduce delivery on a minority of sites. Delivery constraints include poor ground conditions and the need for large-scale master planning, land assembly, business relocations and residential service access improvements.</p> <p>7.7 The supply from other commitments in the current supply and allocated in the urban area has also been discounted by 10% to allow for non-implementation, as some of these sites are also affected by delivery constraints such as poor ground conditions.</p> <p>7.8 The supply from sites with planning permission but not yet under construction has been discounted by 5% in accordance with historic lapse rates. These discounts are balanced rates that take account of the likely availability of external funding to address constraints, as set out in the Viability and Delivery Study.</p> <p>7.9 Together, these discounts provide sufficient flexibility in the housing land supply to meet any unforeseen circumstances.</p>	Amended in accordance with updated calculations	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	paragraph 7.11	<p>Amend text:</p> <p><i>The Plan period has been divided into four phases, covering every five years from 2024. Housing targets for each phase are provided in Table 5.7 details the housing land supply for the plan period. An indicative annualised delivery timeline is set out in the trajectory in Appendix G. These are based on the housing trajectory set out in Appendix I, with further detail provided in the SHLAA. The trajectory demonstrates a steady supply of housing completions over the Plan period, justifying consistent housing targets throughout the Plan period. As set out in the NPPF (paragraph 76), the Council is seeking to confirm through the SLP the existence of a five - year housing land supply from the year of adoption (20256). For this purpose, the buffer applied to housing supply (as set out in the housing trajectory) will be 20%, in line with the most recent Housing Delivery Test results (2023).</i></p>	Update	Yes – the proposed modification introduces a change to the housing numbers to reflect additions to sites with planning permission (i.e. committed development), changes to the

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Appendix I (now Appendix G)	Replace current trajectory graph in Appendix I with new table and graph:	<p>Sandwell Housing Trajectory</p> <p>Table XX Indicative Housing Trajectory and Rolling 5-year supply</p> <table border="1"> <thead> <tr> <th></th> <th>2025/26</th> <th>2026/27</th> <th>2027/28</th> <th>2028/29</th> <th>2029/30</th> <th>2030/31</th> <th>2031/32</th> <th>2032/33</th> <th>2033/34</th> <th>2034/35</th> <th>2035/36</th> <th>2036/37</th> <th>2037/38</th> <th>2038/39</th> <th>2039/40</th> <th>2040/41</th> </tr> </thead> <tbody> <tr> <td>Draft Housing Supply</td> <td></td> <td></td> <td></td> <td></td> <td>1200</td> <td>950</td> <td>600</td> <td>500</td> <td>450</td> <td>550</td> <td>500</td> <td>450</td> <td>400</td> <td>450</td> <td>400</td> <td>350</td> </tr> <tr> <td>Annual requirement taking account of past supply</td> <td></td> <td></td> <td></td> <td></td> <td>600</td> <td>550</td> <td>500</td> <td>450</td> <td>400</td> <td>500</td> <td>450</td> <td>400</td> <td>450</td> <td>400</td> <td>350</td> <td>300</td> </tr> <tr> <td>Draft Housing Plan Target</td> <td></td> <td></td> <td></td> <td></td> <td>600</td> </tr> </tbody> </table>		2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Draft Housing Supply					1200	950	600	500	450	550	500	450	400	450	400	350	Annual requirement taking account of past supply					600	550	500	450	400	500	450	400	450	400	350	300	Draft Housing Plan Target					600	600	600	600	600	600	600	600	600	600	600	600	Update following hearing session	As above
	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41																																																								
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		<i>Total Housing Supply</i>	455	463	535	944	1555	1120	807	601	504	464	603	511	468	594		
		<i>5 year supply</i>	3952	4617	4961	5027	4587	3496	2979	2683	2550	2640	2811	3235	2724	2256		
		<i>Rolling 5 year supply</i>	4.36	5.10	5.48	5.55	5.06	3.86	3.29	2.96	2.81	2.91	3.10	3.57	3.01	2.49		
		<i>Annualised requirement</i>	<u>906</u>															

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		<p style="text-align: center;">Sandwell Trajectory and Managed Delivery Target 2024 - 2041</p> <table border="1"> <caption>Data for Sandwell Trajectory and Managed Delivery Target 2024 - 2041</caption> <thead> <tr> <th>Financial Year</th> <th>Past Net Completions</th> <th>Projected Net Completions</th> <th>Annualised requirement</th> <th>MANAGE: Annual requirement taking account of past completions</th> </tr> </thead> <tbody> <tr><td>2024/25</td><td>~600</td><td>~600</td><td>~600</td><td>~600</td></tr> <tr><td>2025/26</td><td>~400</td><td>~400</td><td>~600</td><td>~600</td></tr> <tr><td>2026/27</td><td>~300</td><td>~300</td><td>~600</td><td>~600</td></tr> <tr><td>2027/28</td><td>~300</td><td>~300</td><td>~600</td><td>~600</td></tr> <tr><td>2028/29</td><td>~300</td><td>~1000</td><td>~600</td><td>~600</td></tr> <tr><td>2029/30</td><td>~300</td><td>~1500</td><td>~600</td><td>~600</td></tr> <tr><td>2030/31</td><td>~300</td><td>~1200</td><td>~600</td><td>~600</td></tr> <tr><td>2031/32</td><td>~300</td><td>~800</td><td>~600</td><td>~600</td></tr> <tr><td>2032/33</td><td>~300</td><td>~500</td><td>~600</td><td>~600</td></tr> <tr><td>2033/34</td><td>~300</td><td>~500</td><td>~600</td><td>~600</td></tr> <tr><td>2034/35</td><td>~300</td><td>~500</td><td>~600</td><td>~600</td></tr> <tr><td>2035/36</td><td>~300</td><td>~500</td><td>~600</td><td>~600</td></tr> <tr><td>2036/37</td><td>~300</td><td>~500</td><td>~600</td><td>~600</td></tr> <tr><td>2037/38</td><td>~300</td><td>~500</td><td>~600</td><td>~600</td></tr> <tr><td>2038/39</td><td>~300</td><td>~500</td><td>~600</td><td>~600</td></tr> <tr><td>2039/40</td><td>~300</td><td>~500</td><td>~600</td><td>~600</td></tr> <tr><td>2040/2041</td><td>~300</td><td>~1000</td><td>~600</td><td>~600</td></tr> </tbody> </table>	Financial Year	Past Net Completions	Projected Net Completions	Annualised requirement	MANAGE: Annual requirement taking account of past completions	2024/25	~600	~600	~600	~600	2025/26	~400	~400	~600	~600	2026/27	~300	~300	~600	~600	2027/28	~300	~300	~600	~600	2028/29	~300	~1000	~600	~600	2029/30	~300	~1500	~600	~600	2030/31	~300	~1200	~600	~600	2031/32	~300	~800	~600	~600	2032/33	~300	~500	~600	~600	2033/34	~300	~500	~600	~600	2034/35	~300	~500	~600	~600	2035/36	~300	~500	~600	~600	2036/37	~300	~500	~600	~600	2037/38	~300	~500	~600	~600	2038/39	~300	~500	~600	~600	2039/40	~300	~500	~600	~600	2040/2041	~300	~1000	~600	~600		
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MM36	SHO2	<p>Amend policy wording.</p> <p>1. Proposals for residential development on sites not specifically allocated for residential use (windfall developments) will be permitted where development on the site is previously developed land and in accordance with other local plan policies.</p> <p>2. Proposals for residential development on unallocated greenfield land will be resisted. Such sites will only be considered where:</p> <ul style="list-style-type: none"> a) The site is not protected open space; or b) The site is council owned land that is deemed surplus to requirements; or 	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.																																																																																										

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		<p>e) the development of the site will bring an underused piece of land back into beneficial use and will not harm the environmental or ecological value of the site and the wider area, in accordance with other relevant policies in the SLP, or cause harm to the significance of heritage assets, including their setting.</p> <p><u>3. All new developments should be supported by the necessary on and off-site infrastructure to serve its needs, mitigate its impacts on the environment and the local community, and ensure that it is sustainable and contributes to the proper planning of the wider area.</u></p>		
		<p>Para 7.13 Delete last sentence:</p> <p><i>However, greenfield proposals will only be considered if they meet the criteria above.</i></p>		Clarification No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM37	SHO3.1	Amend text: <u>Except where provided for in a site allocations policy,</u> the density and type of new housing ...	To reflect allocation policies that have specific density criteria	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SHO3.3	Amend text: <i>All developments of ten homes or more should achieve the minimum net density, on the net developable area, set out below, except where this would prejudice historic character and local distinctiveness as defined in Policy SHE2 ...</i>	Delete for consistency	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SHO3.3a. i	Add 'or' at the end:	Clarification	No – the proposed modification relates to

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		i. located within a Strategic or Town Centre detailed at Table 10; <u>or</u>		points of clarity and does not trigger a change to the conclusions of the HRA.
	SHO3.4	Amend text: <i>4. Table 6 provides details of the appropriate density and, where appropriate, house type mix, to be sought on each housing allocation <u>and any windfall</u> site, in accordance with ...</i>	clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SHO3.5	Amend text: <i>5. Any development that fails to make efficient use of land, by proposing developments where more than half of the proposed homes would have providing a disproportionate number of large, 4+ bedrooms homes when compared with evidenced local housing need, will be refused in accordance with the requirements of this policy.</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SHO3.6	Delete.: <i>6. Development proposals should be consistent with other Local Plan policies.</i>	Consistency	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	Paragraph 7.23	Amend text:	Clarification – in accordance	No – the proposed modification relates to

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p>... Therefore, developments that fail to make the most efficient use of land by proposing developments of schemes where more than half of the proposed homes would have 4+ bedrooms homes when compared with evidenced local housing need, will be refused in accordance with the requirements of this policy and Policy SHO1.</p>	with Policy SHO3.5	points of clarity and does not trigger a change to the conclusions of the HRA.
MM38	SHO4.2	<p>Amend text:</p> <p>... Smaller sites, which could reasonably be expected to form part of a major development in the future, will also need to take this policy into account. The minimum proportion of affordable housing that should be provided, subject to financial viability, is.....</p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	Paragraphs 7.26 – 7.27	<p>Add supporting text to explain how to assess whether financial viability exceptions should apply:</p> <p>7.26 The Viability and Delivery study demonstrates that viability varies greatly according to local housing values and whether the site is greenfield or brownfield. Therefore, a sliding scale of affordable housing requirements, ranging from 10% to 25%, has been set out in Policy SHO4, which reflects this variation. The affordable housing value zones</p> <p>...</p> <p>Therefore, to maximise delivery of affordable housing over the Plan period, it is important that affordable housing is sought on all eligible sites, that viability is assessed on a site-by-site basis where required, and that a flexible approach is employed wherever possible to allow for changing market conditions. The onus will be on the applicant to demonstrate that the provision of the required affordable housing would adversely affect the financial viability of the development proposals. Policy SID1 details steps that need to be taken to demonstrate viability issues.</p> <p>7.27 The Council recognises that exceptional circumstances may sometimes occur where the combined costs of development, including abnormal site conditions, infrastructure, or other planning obligations, would render a scheme unviable if the full affordable housing requirement were applied. In such cases, the applicant will be required to submit a site-specific Financial Viability Assessment (FVA) in accordance with current national guidance. The FVA must provide transparent and robust evidence of all relevant costs.</p>	Justification and clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p><u>values, and assumptions, including land value, build costs, profit levels, and sales values, and must be supported by appropriate market evidence.</u></p> <p><u>7.28 The Council will arrange for any submitted FVA to be independently reviewed, with the cost of the review met by the applicant. The assessment and its findings will be made publicly available, subject to the protection of any genuinely commercially sensitive information. The Council will seek to secure the maximum proportion of affordable housing on a case-by-case basis.</u></p> <p><u>7.29 Where appropriate, review mechanisms will be used to reassess viability at agreed stages of delivery, ensuring that additional affordable housing contributions can be secured if market conditions improve. This approach ensures that flexibility is applied transparently, maintains confidence in the planning process, and delivers the greatest possible contribution to meeting Sandwell's affordable housing needs.</u></p> <p><u>7.27 7.30 The current affordable housing value zones ...</u></p>		
SHO4.2a		<p>Amend text:</p> <p>a. On all sites in a lower zones and brownfield sites in medium value areas zones – 10% affordable housing;</p> <p>b. On greenfield sites in medium value zones – 15% affordable housing;</p> <p>c. b. On all sites in higher...</p>	Clarification and correction	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
SHO4.3		<p>Delete text:</p> <p>3. 25% of the affordable homes required by this policy will be First Homes tenure, as defined in national guidance. First Homes will be provided in accordance with national policy.</p>	Consistency with national policy	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
paragraph 7.31		<p>Delete paragraph – policy now refers to requirements in national policy</p> <p>The tenure of affordable housing to be funded by developers through planning obligations is constrained by national planning policy, as set out above. At least 25% of any affordable homes funded should be First Homes tenure – a specific kind of discounted market sale housing to be sold at 30% below current market value, to eligible persons only, at every future</p>	Update – refers to national policy	No – the proposed modification relates to points of clarity and does not trigger a

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<i>sale¹⁶³. National guidance allows for evidenced local variations in First Homes requirements, however there is no evidence that such variations are required in Sandwell. In addition, the NPPF (paragraph 66) requires at least 10% of all homes on major developments (of ten homes or more) to be affordable home ownership tenure. Annex 2 of the NPPF provides a definition of affordable home ownership¹⁶⁴.</i>		change to the conclusions of the HRA.
	SHO4.6	Delete criterion 6: <i>6. The affordable housing created will remain affordable in perpetuity.</i>	Clarification and update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM39	SHO5.1	Amend text: <i>1. All new homes will be required to meet M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations <u>except where site specific factors such as vulnerability to flooding, site topography, and other circumstances may make a specific site less suitable for M4(2)</u>.</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SHO5.2	Amend text: <i>... (defined as the number of entries added to the self-build and custom build register in the most recent base period for the local authority <u>ward</u> where the site is located),</i>	Correction	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	Paragraph 7.41	Clarify text: <i>7.41 <u>Therefore, where there is identified demand in the borough, this will be assessed on a ward basis and by the number of people registered on the self-build and custom build register in the ward where development is proposed. When an application is submitted... will be provided where appropriate. Where there is no evidence of demand, i.e. the</u></i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<i>Sandwell self and custom build register does not have any names registered for the ward in which the development is proposed, then the applicant will not have to provide self-build / custom build plots in the proposed development.</i>		change to the conclusions of the HRA.
MM40	Paragraph 7.44	Add footnote: <i>Protecting Family Housing</i> <i>Family housing is a self-contained dwelling that is intended for one family or household and has two or more bedrooms.</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM41	SHO7.1	Clarification and additional footnote: <i>1. Proposals for the creation of a House in Multiple Occupation (HMO), including the conversion of buildings or subdivision of dwellings, will only be permitted if this would not result in over 10% of the number of residential properties¹⁷¹ within a 100-metre radius of the application site, measured from the <u>centre point address point*</u> of the property (referred to in this policy as the “relevant area”) operating as HMOs and if the proposals would meet the additional criteria set out in this policy.</i> <i>*The location of an address point is recorded on the Local Land and Property Gazetteer (LLPG) which is managed by Sandwell Council.</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SHO7.3	Correct reference: <i>a. the development would not:</i> <i>i. result in the loss of C3 family-sized dwellings in areas where there is a proven demand for such accommodation (Policy SHO76);</i>	Correction	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	Paragraph 7.53	Add supporting text to make it clear that this policy applies to large HMOs, and after the introduction of an Article 4 direction: <i>7.53 Houses in multiple occupation (HMOs) are defined as homes accommodating three or more unrelated households who typically share kitchens, lounges, and bathrooms. If an Article 4 direction is put in place, which means that the council</i>	Clarification	No – the proposed modification relates to points of clarity and

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<u><i>has removed "permitted development rights." planning permission will be required for small HMOs (3 – 6 people) in specific areas.</i></u>		does not trigger a change to the conclusions of the HRA.
MM42	SHO8.2 (c)	Amend text: <i>For sites where there is likely to be a requirement for on-site provision of new schools, this is set out in Appendix B Chapters 16 and 17.</i>	Clarification and update	No – the proposed modification relates to addition of new chapters and does not trigger a change to the conclusions of the HRA.
MM43	SHO9.2	Amend as follows: <i>2. Table 11 sets out the need for new Gypsy and Traveller permanent pitches and Travelling Showpeople plots will be provided to meet identified needs up to 2031 as set out in Table 9, in accordance with the Black Country Gypsy and Traveller Accommodation Assessment (GTAA) 2022.</i> Insert table: <u><i>Table 11: Need and Supply of Gypsy and Traveller Permanent Pitches and Travelling Showpeople Plots</i></u>	Clarification and update	No. Whilst this modification acknowledges a change in pitch need the total number of gypsy and traveller pitch allocations has not changed. Therefore, there will be no change to the conclusions of the HRA.
	SHO9.4f	Delete reference to BNG from list of criteria: <i>... e. ... drainage, sewage and waste disposal (storage and collection); f. a minimum 10% biodiversity net gain is demonstrated in accordance with Policy SNE2; and</i>	Statutory requirement - duplication	No – the proposed modification relates to points of clarity and does not trigger a

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<i>g. f. the site should not be at risk of flooding</i>		change to the conclusions of the HRA.
	Paragraph 7.71	Amend text: <i>A Gypsy and Traveller Accommodation Assessment (GTAA) for the Black Country was completed in 2022, in accordance with national guidance, and identified the likely future local need for Gypsy and Traveller and Travelling Showpeople accommodation. Table 9 demonstrates that the Council cannot provide a 5-year supply for Gypsy and Traveller pitches. It is anticipated that allocations and permissions will provide sufficient supply to meet targets up to 2031, and sSmall windfalls within the urban area are expected to meet remaining need over the Plan period. ...</i>	Update	Whilst the calculated need for Gypsy and Traveller pitches has increased, the total allocated pitches has not changed from the Submission SLP. Therefore, there will be no change to the conclusions of the HRA.
	Paragraph 7.75	Amend text: <i>The SLP aims to meet the needs of existing families that meet the Planning Policy for Travellers Sites 2015-2024 (PPTS) travel for all definition (excluding those living in bricks and mortar accommodation) as identified in the GTAA as 'ethnic identity', by continuing to deliver privately and publicly owned sites and pitches. The total need identified is for eight <u>twelve</u> pitches up to 2031, and an additional six pitches from 2031 to 2041, totalling 18 pitches across the plan period. The Plan has allocated one site with ten pitches, so has a shortfall of eight pitches across the plan period.</i>	Clarification and update	As above.
	Paragraph 7.76	Delete Table 9 Table 9 – Supply of Gypsy and Traveller Permanent Pitches up to 2031	Update – see related modifications	As above.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?												
		<table border="1"> <thead> <tr> <th>Type of Supply</th> <th>Number</th> </tr> </thead> <tbody> <tr> <td>Existing authorised pitches</td> <td>16</td> </tr> <tr> <td>Regularise temporary / unauthorised sites (b)</td> <td>0</td> </tr> <tr> <td>Intensify and extend existing sites (c)</td> <td>0</td> </tr> <tr> <td>Pitch allocations (d, e)</td> <td>10</td> </tr> <tr> <td>Total New Pitches</td> <td>10</td> </tr> </tbody> </table>	Type of Supply	Number	Existing authorised pitches	16	Regularise temporary / unauthorised sites (b)	0	Intensify and extend existing sites (c)	0	Pitch allocations (d, e)	10	Total New Pitches	10		
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	Paragraph 7.77	<p>Delete paragraph:</p> <p><i>Table 9 demonstrates how this approach will deliver sufficient pitches to meet the need up to 2031 plus a buffer of two pitches (20%) – providing a five year deliverable supply of pitches from adoption of the SLP in 2025, as required by the PPTS. The approach will also provide 71% of the total need for 14 pitches over the Plan period (2024-41).</i></p>	Consequential update in respect of deletion of Table 9	As above												
	Paragraph 7.78	<p>Amend text:</p> <p><i>It is not possible to identify and allocate further sites to meet the remaining need for four <ins>eight</ins> pitches up to 2041, as no deliverable site options were put forward through the Sandwell Local Plan preparation process ...</i></p>	Update	As above.												
MM44	SHO10	<p>Amend title:</p> <p><i>Policy SHO10 - Housing for people with specific needs <ins>requirements</ins></i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the												

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				conclusions of the HRA.
	SHO10.1	<p>Amend as follows:</p> <p>1. Proposals for specific forms of housing including children's homes, care homes, nursing homes, extra care facilities. <u>housing for older people</u>, or any other identified need, will be considered in relation to the following criteria:</p> <p><i>a. the type of specialist accommodation proposed meets identified needs;</i></p> <p><i>b. compatibility with adjacent uses;</i></p> <p>...</p> <p><i>h. proximity to facilities;</i></p> <p><i>i. the proposal meets the accessibility requirements set out in Policy SHO5.</i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SHO10 Para 7.82	<p>Include the level of need for older persons accommodation:</p> <p><i>To plan effectively for people with specific needs, the Council will develop a series of strategies to help meet these needs¹⁷⁷, which will be implemented over the Plan period. <u>The Strategic Housing Market Assessment 2024 identified a requirement for 1,708 additional units of sheltered housing for older people / retirement housing and 378 additional extra care units / supported living housing in Sandwell over the plan period.</u></i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM45	SEC1.2a	<p>Amend text:</p> <p>2. The borough is subject to a demand for <u>211 229.5</u> hectares of new employment land (based on the past trends forecast of <u>185 203.5</u> hectares and accounting for the loss of employment land of 26 hectares to non-employment uses), between 2020 and 2041. This will be delivered through:</p> <p>a) The development of employment development sites allocated in the Plan, equal to <u>42 44.5</u> hectares (this figure includes past completions since 2020).</p>	Update figure	<p>Yes – the proposed modification updates the employment figures in the policy to reflect the latest evidenced need and supply.</p> <p>This change has been assessed in the Main</p>

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				Modifications HRA Report.
	SEC1.3	Amend text: <i>The Plan will deliver a portfolio of employment development sites of various sizes and quality to meet a range of business needs. This land is The employment development sites, in addition to those sites currently occupied for employment uses purposes under Policies SEC2, SEC3 and SEC4. These sites will be safeguarded for industrial employment uses uses under Use Classes E(g)(ii), E(g)(iii), B2, and B8.</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SEC1.4	Amend text: <i>... the Council will support, with public intervention as necessary, the regeneration and renewal of such areas, including their environmental enhancement, the protection and enhancement of heritage significance where it occurs and the incorporation of sustainable measures to mitigate climate change impacts. ...</i>	Make reference to heritage assets	No – the proposed modification relates to a requirement to reference heritage assets which does not trigger a change to the conclusions of the HRA.
MM46	SEC4.2b	Amend text: <i>... if the site is occupied or part-occupied, that successful engagement has been undertaken with the occupiers to secure their relocation and the site has been genuinely marketed for employment use for a period of at least 12 months.</i>	Clarify that occupied sites will also undergo marketing as described in criterion 2a	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM47	SEC6 Paragraphs 8.50 – 8.51	Add new paragraph between paragraphs 8.50 – 8.51 and renumber remaining paragraphs: <i>8.50 ... by the businesses operating in these areas.</i>	Clarification - explain Council would	No – the proposed modification relates to points of clarity and

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p><u>8.51 In this context, it is recognized that some existing industrial or commercial uses may cause significant nuisance or harm to neighbouring residential areas. While the complete removal of these 'bad neighbours' may not always be feasible or desirable due to economic and employment considerations, the Council would support proposals that seek to replace them with less harmful neighbours - businesses or uses that have a reduced impact on adjacent sensitive uses such as housing. This approach aims to balance the protection of residents from harmful impacts with the need to maintain a viable local economy, ultimately fostering a more sustainable coexistence between employment land and sensitive residential areas.</u></p> <p><u>8.51 8.52 Equally, given pressure on older ...</u></p>	support the replacement of a bad neighbour by a 'less harmful' neighbour.	does not trigger a change to the conclusions of the HRA.
MM48	SCE1.6b	<p>Amend text:</p> <p><i>b. the consolidation and reconfiguration of vacant floorspace into a mix of uses, especially the residential use of upper floors where appropriate, and / or extensions to existing floorspace, with any new development being well-integrated with existing provision;</i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SCE1	<p>Add new criterion:</p> <p><i>... 6d ... coverage where appropriate.</i></p> <p><u>7. Proposals should recognise, protect and make use of heritage assets so that they can contribute to environmental, economic and community regeneration consistent with their status, securing their long-term viability through sensitive repair, restoration, and adaptive reuse.</u></p> <p><u>Proposals will be supported where they protect and enhance heritage significance, contribute to town centre vitality, and deliver public benefits that outweigh any potential harm.</u></p>		No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	Table 10.	<p>Amend heading at end of first column and include Abbey Road and Hagley Road West in alphabetical list:</p> <p><i>Proposed local centres:</i></p> <p>Update the rest of the plan for consistency.</p>	Update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

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MM49	SCE2	<p>Consistent references to Primary Shopping Area, delete reference to Retail Core:</p> <ol style="list-style-type: none"> 1. <i>The Retail Core / Primary Shopping Areas within the centres of Sandwell are defined on the Policies Map.</i> 2. <i>To ensure that uses defined by Use Class E (commercial, business and services¹⁹⁴) remain the predominant uses within the defined retail core / primary shopping areas...</i> 3. <i>Changes of use of ground floor premises that require planning consent in Retail Core / Primary Shopping Areas will be assessed...</i> 4. <i>In centres with no defined retail core or Primary Shopping Area, proposals for....</i> <p>Make consequential updates to town centre plans in SLP to reflect changes to designations.</p>	Update and consistency	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM50	SCE4.1	<p>Amend text:</p> <p><i>Proposals for appropriate uses (paragraphs 9.68 – 9.71 9.70) ... (in-centre locations being defined in paragraph 9.67a 9.70) ... catchment areas of those centres. <u>In addition, the residential reuse of upper floors will be considered positively where appropriate.</u></i></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	Paragraphs 9.42 – 9.44	<p>Delete text:</p> <p><i>9.42 A new local centre has been designated on Hagley Road West (Hollybush). Its designation corrects an anomaly. This centre includes 37 commercial units providing convenience and comparison outlets, food outlets, financial services, grooming and health services, some of which are double fronted. Until comparatively recently it had no convenience offer. This has since changed, hence its eligibility for inclusion as a centre. It is located on the boundary between Sandwell and Birmingham City Council, with further commercial units in Birmingham; functionally it is significantly larger than several existing Sandwell Tier Three centres. It has been monitored annually for several years. The review of the Local Plan is the correct time to incorporate it into the hierarchy of centres.</i></p> <p><i>9.43 Another new centre, Abbey Road Local Centre, is proposed at the junction of Wigorn Road and Abbey Road, Smethwick. Its designation corrects an anomaly. This centre comprises 24 commercial units including a post office, food outlets, grooming and health services. It also has a long standing convenience offer. It also has a long standing convenience offer. Functionally, it is larger than several existing Sandwell Tier Three centres. The review of the Local Plan is the correct time to incorporate it into the Hierarchy of Centres.</i></p>	Update status of local centres	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

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		<i>9.44 The former Tier Three centre located at the junction of Hagley Road and the A4123 (known as Hagley Road / Jonathan's) has been removed from the Hierarchy of Centres as it no longer fulfils the function of a local centre, having lost most of its functions since it was first identified, including the key convenience aspect of its offer.</i>		
MM51	SWB1.2	Add criterion: <u>2.j conserving and enhancing the historic environment (Policies SHE1 – SHE4).</u>	Soundness	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	Paragraphs 10.24 – 10.25 Table 11	Amend tables to delete references to undiscounted housing figures in columns headed indicative Land Use		No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM52	SWB2.1a	Amend text: <i>Residential provision will be maximised, to increase and strengthen communities, with indicative housing capacity identified by the West Bromwich Masterplan and West Bromwich Inset, providing a minimum of 1,162 1,536 new homes in the strategic centre by 2041.</i>	Clarification	Yes – the proposed modification introduces a change to the housing numbers to reflect additions to sites with planning permission (i.e. committed development), changes to the windfall allowance and the removal of

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
				discounting made in the Submission SLP. This change has been assessed in the Main Modifications HRA Report.
	Paragraph 10.41 Figure 13	<p>Amend and update text:</p> <p><i>The strategic centre boundary and Primary Shopping Area are is identified on the Policies Map and shown at Figure 13. # is They are used for determining what is in and out-of-scope in terms of proposals.</i></p> <p>Plan of Wednesbury Town Centre to be replaced with one of West Bromwich Town Centre (see AM61)</p>	Update and consistency Correction	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM53	Paragraph 11.4 Figure 14	<p>Amend Figure 14:</p> <p>Existing Transport Network Map</p> <p>The plan is missing the current cross-city route from Smethwick (near Rolfe Street Railway Station), through Cape Hill, towards Birmingham (serving buses 54, 82 and 87) and this should be added to the plan.</p>	Corrections	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	STR1 Figure 16	<p>Amend Figure 16:</p> <ul style="list-style-type: none"> The plan is missing the current cross-city route from Smethwick (near Rolfe Street Railway Station), through Cape Hill, towards Birmingham (serving buses 54, 82 and 87) and this should be added to the plan. The plan shows a route along the A457 Tollhouse Way / Soho Way and then along the B4135 Cranford Street / Heath Street; however, there are no bus services along this route, which should be amended. <p>The route along Hamstead Road should continue up to the A4041 Newton RoadCore Bus Network - replace map with amended version</p>	Corrections	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

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MM54	Paragraph 11.27	Amend text: <i>... by rapid transit and core bus routes (the West Midlands Core Bus Network as shown on Figure 14 <u>or as amended from time to time</u>) ...</i>	Correction and update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM55	STR2 Paragraph 11.28	Amend text: <i>... in consultation with neighbouring highway authorities. <u>Since 2025, the power to alter the KRN has been devolved to the WMCA Mayor. All policies relating to the KRN will apply to the network as amended from time to time.</u> The KRN features ...</i>	Clarify role of WM Mayor	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM56	STR4.5	Amend text: <i>Existing and disused railway lines <u>and sidings, and any that become disused in the future</u>, will be safeguarded for rail-related use</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM57	STR5 Paragraph 11.51	Amend text: <i>All new cycle facilities will be designed in accordance with guidance set out in Local Transport Note 1/20 and TfWM's Cycle Design Guidance. <u>Where cycle routes and associated facilities are located in areas of heritage, archaeological or ecological sensitivity, their design should take this into account.</u></i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

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MM58	STR9 .1d	Correction: ... such <u>as</u> hydrogen fuel cells ...	Correction to wording	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM59	SID1.1	Amend text: <i>All new developments should be supported by the necessary on and off-site infrastructure to serve its needs, mitigate its impacts on the environment and the local community, and ensure that it is sustainable and contributes to the proper planning of the wider area.</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SID1.3	Amend text: <i>A planning application that complies with up-to-date policies within this plan will be assumed to be viable and should seek to provide any relevant planning contributions necessary to make it acceptable in planning terms. The onus will be on the applicant to demonstrate that the provision of planning contributions would adversely affect the financial viability of the development proposals.</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SID1.4	Add wording: <u>Where an applicant submits a planning application that seeks to make a reduced planning contribution on viability grounds, financial viability assessments conforming to national guidance will be required to be submitted prior to determination and, where necessary independently appraised by an appropriate professional appointed by the local planning authority at the cost of the applicant. The onus will be on the applicant to demonstrate that the provision of planning contributions would adversely affect the financial viability of the development proposals.</u>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

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	SID1.5	Amend text: <i>5. Any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances, and in such circumstances an executive summary will be made publicly available.</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SID1.7	Amend text: <i>7. Sandwell Council will set out in an Infrastructure Delivery Plan <u>(to be reviewed annually)</u>:</i>	Update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM60	Paragraph 12.17	Amend text – refer to emergency services: <i>j) <u>Public services including emergency facilities.</u></i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM61	SID2	Amend text: <i>5G, <u>6G and Future Digital</u> Networks</i> ... <i>1. Any proposals for infrastructure to support the delivery of 5G <u>and future, more advanced, digital</u> networks will be supported in principle</i> ...	Update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<i>Operators proposing 5G and future, more advanced, digital network infrastructure are strongly recommended to enter early discussions with the Council.</i>		
MM62	Glossary Appendix O (now Appendix N)	Modify definition of infrastructure: <i>Basic services necessary for development to take place, e.g., roads, electricity, sewerage, water, education, and health facilities, and public service infrastructure and facilities (including emergency services).</i>	Update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM63	SWA2.1	Amend text: <i>Sandwell will safeguard all existing strategic and other waste management facilities from inappropriate incompatible development to maintain existing maximum levels of waste management capacity and meet Strategic Objective 17, unless it can be demonstrated that...</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM64	Paragraph 13.41	Amend first sentence: <i>13.41 When determining applications for non-waste development within a short distance of or adjacent to an existing waste management facility, regard will be had to any potential adverse impacts the proposed development might have on the future of the site as a location for the continuation of waste management activities in accordance with the 'agent of change' principle.</i>	Align with the NPPF and the 'Agent of Change Principle'.	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM65	SWA4.3 and 4.4 Paragraphs 13.68 – 13.71	Delete criteria SWA4.3 and 4.4: <i>Waste Applications – Supporting Information</i> <i>3. Planning applications for waste development¹²³² should include a supporting statement that clearly describes the key characteristics of the development. It should also explain how the development aligns with Strategic Objective 17 and</i>	Remove from the policy into supporting text - considered	No – the proposed modification relates to points of clarity and does not trigger a change to the

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p>the General Principles and Preferred Methods of managing waste in Policy SWA1. In particular, the application should explain the contribution the development would make towards driving waste up the waste hierarchy, supporting the development of a more circular economy, meeting the Black Country's additional waste capacity requirements, and broadening the range of waste facilities currently available in the plan area.</p> <p><u>4. The following information should also be included in the supporting statement and / or on the planning application form:</u></p> <ul style="list-style-type: none"> <i>a. the type of waste facility or facilities proposed;</i> <i>b. the waste streams and types of waste to be managed;</i> <i>c. the types of operation to be carried out on the site;</i> <i>d. whether waste would be sourced locally, regionally or nationally;</i> <i>e. the maximum operational throughput in tonnes per annum;</i> <i>f. for waste disposal, the total void space to be infilled in cubic metres;</i> <i>g. the outputs from the operations, including waste residues;</i> <i>h. the expected fate and destination of the outputs;</i> <i>i. the number of associated vehicular movements;</i> <i>j. the number of jobs created.</i> <p>Move deleted text into justification text at paragraphs 13.68 - 13.71; redraft to avoid duplication:</p> <p><i>13.70 To assist applicants, the policy sets out the key pieces of information they should provide to enable the Council to understand the types of operation proposed and the potential effects of the development on the environment and on the health, wellbeing and amenity of people living or working near the site. This information should be collated together into the summary included in the supporting statement.</i></p> <p><i>13.71 The most appropriate place to set out, describe in detail and assess such a proposal against relevant planning policies is within a Planning Statement. In addition, if the development requires an Environmental Impact Assessment (as it represents Schedule 1 or 2 development), details should be included in an Environmental Statement. The following information should also be included in the supporting statement and / or on the planning application form:</i></p> <ul style="list-style-type: none"> <i>a) the type of waste facility or facilities proposed;</i> <i>b) the waste streams and types of waste to be managed;</i> <i>c) the types of operation to be carried out on the site;</i> <i>d) whether waste would be sourced locally, regionally or nationally;</i> 	<p>to be supporting information to the policy.</p>	conclusions of the HRA.

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		<p>e) <u>the maximum operational throughput in tonnes per annum;</u></p> <p>f) <u>for waste disposal, the total void space to be infilled in cubic metres;</u></p> <p>g) <u>the outputs from the operations, including waste residues;</u></p> <p>h) <u>the expected fate and destination of the outputs;</u></p> <p>i) <u>the number of associated vehicular movements;</u></p> <p><u>the number of jobs created.</u></p>		
MM66	Paragraph 13.94	<p>Explain where sand and gravel will be imported from:</p> <p>...It is therefore unlikely that Solihull will be able to sustain the same rates of sand and gravel sales seen over the last ten years, at least in the short-term until new sites come forward. <u>The latest information available shows that Staffordshire is by far the largest producer of sand and gravel in the West Midlands region and is the main source of imports to the West Midlands Metropolitan Area.</u></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM67	SMI2.3 Appendix O (now Appendix N)	<p>Add text:</p> <p>... planning permission will be granted for built development within the <u>Limestone</u> Consideration Zones ...</p> <p>Add the following to the Glossary:</p> <p><u>Limestone Consideration Zones – These have been defined around areas that would be seriously affected by surface subsidence in the event of the collapse of an abandoned limestone mine. If new development is to be allowed within a Consideration Zone, the developer will be required to demonstrate that a collapse in the mine would not prejudice public safety or compromise the structural integrity of the proposed structures.</u></p>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM68	SCO3.	<p>Update footnote references to NPPF Dec 2023:</p> <p>²⁴⁰ <u>NPPF (2021) paragraph 174, section (e) NPPF (2023) paragraph 180, section (e)</u></p> <p>²⁴⁸ <u>NPPF (2021) paragraph 174, section (e) NPPF (2023) paragraph 180, section (e)</u></p> <p>²⁴⁹ <u>NPPF (2021) paragraph 174, section (f) NPPF (2023) paragraph 180, section (f)</u></p> <p>²⁵¹ <u>https://mapapps2.bgs.ac.uk/coalauthority/home.html - https://datamine-cauk.hub.arcgis.com/</u></p>	Correction Refer to 2023 NPPF for consistency	No – the proposed modification relates to points of clarity and does not trigger a change to the

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			URL has been updated.	conclusions of the HRA.
MM69	SDM1.1h	Remove policy reference from criterion 1h: <i>h. the presence of canals in Sandwell's urban environments and the opportunities they offer for design, accessibility, the environment and technology (Policy SNE6);</i>	Delete anomalous reference for clarity.	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SDM1.2	Amend text: <i>... and where appropriate used to inform design and access statements <u>and site-specific design codes (where agreed with the Council)</u> that reflect their Sandwell-specific context...</i>	Clarification on use of guidance to inform local design	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	SDM1.3	Amend text: <i>Major development proposals should contribute to the greening of Sandwell by <u>demonstrate that the following opportunities have been considered and where appropriate used to inform the design:</u> ...</i>	Consistency of approach	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
	Paragraph 15.14	Include in supporting text: <i>15.14 To ensure that development proposals accord with policy requirements, the Design and Access Statements accompanying planning applications should follow the Government's guidance, "Making an application" (2014) (updated 2021).</i>	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?															
		<p><u>15.15 The following table sets out a list of policies that are cross-referenced against criteria a to j of part 1 of the policy. This is intended to provide a useful starting point for members of the public and developers who want to understand what policies might apply to schemes that are being proposed. This is not a closed list, and other SLP policies will also apply where appropriate.</u></p> <table border="1"> <thead> <tr> <th><u>Policy section</u></th><th><u>Other policies in SLP</u></th></tr> </thead> <tbody> <tr> <td><u>a. the topography, townscapes and landscapes of Sandwell;</u></td><td><u>SDS5, SDS8, SNE1 – SNE6, SHE1 – SHE4, SHW4</u></td></tr> <tr> <td><u>b. the need to maintain strategic gaps and views, including to and from the Rowley Hills;</u></td><td><u>SDS5, SDS7, SDS8, SNE5, SHW4</u></td></tr> <tr> <td><u>c. the built and natural settings of development;</u></td><td><u>SDS8, SNE1 – SNE6, SHE1 - SHE4</u></td></tr> <tr> <td><u>d. the need to ensure that domestic extensions should generally be subservient and proportionate to the existing dwelling and should be in keeping with their surroundings by virtue of their scale, architecture and materials.</u></td><td><u>SDS5, SHE1 – SHE4 (where relevant) SHO7, SHO10, SDM2</u></td></tr> <tr> <td><u>e. the treatment of 'gateway' opportunities where they occur in key locations;</u></td><td><u>SDS5, SDS8, SNE3,</u></td></tr> <tr> <td><u>f. Sandwell's industrial and domestic architecture;</u></td><td><u>SDM2, SDM3</u></td></tr> <tr> <td><u>g. the need to ensure development has no harmful impacts on key environmental and heritage assets, townscapes and locations and that wherever possible it contributes to the conservation and enhancement of environmental and heritage assets and their settings;</u></td><td><u>SDS2, SDS8, SNE1 – SNE6, SHE1 – SHE4, SDM3 - SDM5</u></td></tr> </tbody> </table>	<u>Policy section</u>	<u>Other policies in SLP</u>	<u>a. the topography, townscapes and landscapes of Sandwell;</u>	<u>SDS5, SDS8, SNE1 – SNE6, SHE1 – SHE4, SHW4</u>	<u>b. the need to maintain strategic gaps and views, including to and from the Rowley Hills;</u>	<u>SDS5, SDS7, SDS8, SNE5, SHW4</u>	<u>c. the built and natural settings of development;</u>	<u>SDS8, SNE1 – SNE6, SHE1 - SHE4</u>	<u>d. the need to ensure that domestic extensions should generally be subservient and proportionate to the existing dwelling and should be in keeping with their surroundings by virtue of their scale, architecture and materials.</u>	<u>SDS5, SHE1 – SHE4 (where relevant) SHO7, SHO10, SDM2</u>	<u>e. the treatment of 'gateway' opportunities where they occur in key locations;</u>	<u>SDS5, SDS8, SNE3,</u>	<u>f. Sandwell's industrial and domestic architecture;</u>	<u>SDM2, SDM3</u>	<u>g. the need to ensure development has no harmful impacts on key environmental and heritage assets, townscapes and locations and that wherever possible it contributes to the conservation and enhancement of environmental and heritage assets and their settings;</u>	<u>SDS2, SDS8, SNE1 – SNE6, SHE1 – SHE4, SDM3 - SDM5</u>	conclusions of the HRA.
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<u>a. the topography, townscapes and landscapes of Sandwell;</u>	<u>SDS5, SDS8, SNE1 – SNE6, SHE1 – SHE4, SHW4</u>																		
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		<p><i>h. the presence of canals in Sandwell's urban environments and the opportunities they offer for design, accessibility, the environment and technology</i></p> <p><i>i. the matter of land instability where this is an issue in relation to specific development proposals;</i></p> <p><i>j. the need to mitigate and adapt to the impacts of climate change in accordance with the relevant policies in the plan.</i></p>	<u>SDS8, SNE6, SHW4, STR5, SID2</u> <u>SCO3</u> <u>SDS2, SDS8, SCC1 – SCC6, SDM2</u>	
	Paragraph 15.15 onwards	<p>Amend text to refer to situations where developers may want to use their own design codes:</p> <p><i>15.15 15.16 Not all the guidance ...as part of the proposal's supporting information.</i></p> <p><i>15.17 The Sandwell Design Code provides locally specific advice for everyone submitting a planning application on what standards and details the Council will be expecting from all new buildings in the borough. It sets out both primary requirements and additional guidance for all development proposals in Sandwell. If a situation arises where it is felt the code does not address a particular issue on a site that may be relevant to matters of design, proposals will be expected to reflect and evidence the most relevant and up-to-date national design guidance available, including the contents of the extant National Model Design Code, on how their proposals have addressed this issue.</i></p> <p><i>15.18 As set out in Policy SDS5, schemes that do not use / comply with the Sandwell Design Code will be refused unless specific and convincing reasons can be provided for not doing so.</i></p> <p><i>15.19 Where a developer wishes to utilise their own design code, their code must be agreed with the Council. Their approach must still accord with local design principles set out in the Sandwell Design Code and follow the process as set out in the National Model Design Code as appropriate, which includes the need to conduct evidenced community engagement prior to the code being agreed with the Council.</i></p>	Clarification and justification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM70	SDM2.1 And new paragraph (15.26)	<p>Amend text to address other potential exceptions:</p> <p><i>... except where it can be clearly evidenced that the implementation of the NDSS would cause harm to the significance of a heritage asset²⁶⁴, or the development proposes an innovative design for the construction of, or a change of use to, a small dwelling. Any other proposed departures from the NDSS standards, including for the conversion of former non-residential buildings such as from office blocks to apartments, will require robust and convincing justification to be demonstrated before a scheme will be approved.</i></p>	Clarification and justification	No – the proposed modification relates to points of clarity and does not trigger a change to the

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p>New paragraph in justification:</p> <p><u>15.26 All new-build dwellings will be expected to meet the NDSS, including apartments, as will the conversion of commercial, industrial or similar non-domestic buildings to provide residential accommodation. The policy identifies limited exceptions to this, allowing for an element of flexibility in certain circumstances:</u></p> <ul style="list-style-type: none"> <u>The successful conversion of a heritage asset to a dwelling will be dictated in some instances by the form the building takes, including through the retention of the structure as it was first constructed. This may in turn preclude the imposition of the NDSS in the interests of maintaining its significance.</u> <p><u>There may also be situations where a proposal for a purpose-built small house (often referred to as a tiny or micro home and typically having a floor area of 50m² or less) would not deliver room sizes to match the NDSS. This offers flexibility in considering innovative designs that may come forward from individuals interested in developing such a property.</u></p>		conclusions of the HRA.
SDM2.3 Paragraph 15.28	Amend policy and justification text:	<p>2. <u>New residential development (including conversions from non-residential properties) and houses in multiple occupation will be required to meet the water efficiency standard of 110 litres per person per day, as set out in Part G2 of current Building Regulations or as identified in any successor legislation. Developers are encouraged to implement higher water efficiency standards where possible.</u></p> <p><u>15.28 ... This change in water stress classification adds further weight to the need for a tighter water efficiency limit to be adopted; this will be enforced through the building regulations system. Where new water efficiency standards emerge during the plan period, they will be used in place of the one set out in the policy. Both Severn Trent and South Staffordshire Water currently offer incentives, overseen by Ofwat, that provide financial payments to developers who build homes that achieve lower water consumption levels such as 100 litres per person per day or less.</u></p>	Clarification and update	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM71	SDM3.1	Amend text:	Clarification and cross-reference	No – the proposed modification relates to points of clarity and does not trigger a change to the

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				conclusions of the HRA.
SDM3.5g	Amend policy text; relocate to justification (paragraph 15.33): <i>... 5g. the proposal will integrate into its surroundings at all levels, particularly at street level and skyline.</i>		Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
SDM3.6a	Amend to mention views and settings of the existing local skyline: <i>6a. key <u>extant</u> landmark buildings, structures and features will be preserved and improved; <u>views of them and their settings will be protected as necessary;</u></i>		Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
Paragraph 15.33	Amend text to clarify definition and renumber subsequent paragraphs accordingly: <i>15.32 This policy does not aim to hide tall buildings, but to ensure that they are located and designed to create a positive feature in the urban environment from all viewpoints.</i> <i>15.33 It is important to understand what is meant by tall or taller buildings in a Sandwell-specific context. Most of the buildings in Sandwell are residential in nature and appearance, so in the wider borough there are relatively few examples of taller or tall buildings, except in certain locations. Some industrial, office and leisure buildings and telecommunication structures are key landmarks on the borough's skyline, however.</i> <i>Based on information from the emerging Sandwell Design Code:</i> <ul style="list-style-type: none"> <i>In most of Sandwell, building heights tend to be between one to three storeys, with the majority of residential properties being two storeys.</i> <i>In the regeneration areas identified in the SLP (Dudley Port and Tipton, Smethwick, Wednesbury and West Bromwich), there are concentrations of taller buildings of between three to four storeys.</i> 	Clarification	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.	

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		<ul style="list-style-type: none"> <u>Some taller buildings (between three to four storeys) also stand close to the Metro and along other public transport corridors.</u> <u>In West Bromwich there are several buildings above five storeys in height, for example in Charlemont and Newton.</u> <u>There are other examples of residential towers exceeding eight storeys in height in various parts of the borough including at Windmill Lane (Smethwick), Whiteheath Gate (Oldbury), and Wallace Road (Tividale).</u> <p><u>For the purposes of this policy, therefore, a taller building would be dependent on local context and location but is likely to be one or more storeys taller than the prevailing building height in the area. A tall building would be one located within West Bromwich, or in other town centre locations where appropriate, and may be over five storeys in height depending on its context and the adjacent morphology. Proposed buildings of this scale should:</u></p> <ul style="list-style-type: none"> <u>be designed to respond to their local setting and character,</u> <u>consider and address any potential impacts on areas or buildings of heritage significance, and</u> <u>be accompanied by a site-specific analysis, visual impact analysis and /or site design code, where agreed by the Council.</u> <p>Include text relocated from policy:</p> <p><u>15.33 15.36 In designing tall buildings, emphasis should be given ... It may also be appropriate to set taller elements of the building back from the street frontage. Tall buildings will need to integrate into their surroundings at all points, particularly at street level and skyline. Should such a proposal potentially obscure parts of a skyline already containing landmark features / buildings, this will be taken into consideration when a decision is made.</u></p>		
MM72	Paragraph 15.40	Amend text: <i>15.40 In conservation areas, advertising proposals will also be expected to demonstrate how they would conserve or enhance the character and appearance of the area, as required under Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 (see Policies SHE1 – SHE 4 for further guidance on proposals in the historic environment).</i>	Cross-reference	No – the proposed modification relates to points of clarity and does not trigger a change to the conclusions of the HRA.
MM73	SDM5.2	Add criterion dealing with heritage assets in terms of both shop fronts and roller shutters. Add supporting text to explain LB consent needed for fitting roller blinds inside and outside the building. Emphasise the need to understand the significance of the building.	Clarification	No – the proposed modification introduces additional

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
	and paragraph 15.45	<p>... 2h. whilst the appearance of a building should not be compromised, consideration should be given to natural surveillance, safety and security when designing new shop fronts.</p> <p>3. <u>Where development proposals involve works to shopfronts or the installation of roller shutters affecting heritage assets, including Conservation Areas and Listed Buildings, the design and materials must conserve or enhance the asset's significance and setting. Proposals should follow the guidance set out in Policies SHE1 - SHE4 and avoid visually intrusive or unsympathetic alterations that would harm the building's architectural or historic character or that of the historic environment it lies within.</u></p> <p>...</p> <p>15.45 Well-designed roller shutters such as this will prevent the creation of a solid, unwelcoming appearance especially at night when most businesses are closed.</p> <p><u>15.46 Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Alterations to shopfronts and the installation of security features such as roller shutters can have a pronounced impact on the character and appearance of historic buildings and areas. Listed Building Consent will be required even for minor works, including the installation of internal or external roller blinds or shutters, where they affect the special architectural or historic interest of a listed building.</u></p>		policy wording to reinforce existing heritage protection requirements for shopfronts, providing greater clarity and helping to avoid harm to heritage assets. It does not trigger a change to the conclusions of the HRA.
MM74	SDM6, SDM7	<p>Combine into one policy:</p> <p><u>Policy SDM6 - Hot Food Takeaways</u></p> <p><u>I: In principle considerations</u></p> <p><u>Vitality and Viability</u></p> <p>1. <u>A percentage limit for the appropriate number of hot food takeaways in centres (strategic, town, district and local), including hot food takeaway permissions, and vacant units with a hot food takeaway as their lawful use is as follows:</u></p> <p>a) <u>in centres with 40 retail units or more – no more than 7% of frontages should be occupied by hot food takeaways;</u></p> <p>b) <u>in centres with less than 40 retail units – no more than 12% of the frontages should be occupied by hot food takeaways.</u></p> <p><u>Clustering of hot food takeaways in centres.</u></p> <p>2. <u>No more than two hot food takeaway outlets should be located next to each other. Any application for a further hot food takeaway use that would exceed this limit will not be permitted.</u></p>	Clarification and effectiveness Update associated text and paragraph numbering accordingly	Yes – the proposed modification combines two policies that were assessed in the Regulation 19 HRA, into a single policy. This modification has been assessed in the Main Modifications HRA Report.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p>3. <u>Where two hot food takeaways are located next to each other, they should be separated from any new hot food takeaway unit by at least two non- hot food takeaway units.</u></p> <p><u>Exclusion zones</u></p> <p>4. <u>An exclusion zone will be implemented near to secondary schools and higher education establishments: no new hot food takeaway developments will be permitted where they are within 400 metres of a secondary school or college site (as measured in a straight line from the school entrance(s) used by pupils / students).</u></p> <p><u>II: Detailed Matters</u></p> <p>5. <u>Where the above requirements have been satisfied and the Hot Food Takeaway is acceptable in principle the following additional measures to protect the amenity of surrounding residential occupiers will apply:</u></p> <p><u>Amenity</u></p> <p>i. <u>No new hot food takeaways will be permitted where they are directly adjacent to residential property at ground floor level. This does not apply to first / second floor flats above or diagonally above a proposed hot food takeaway.</u></p> <p>ii. <u>Where there is an existing residential unit above a proposed hot food takeaway, which is not connected with its operation, private residential amenity should not be prejudiced. Specific attention will need to be given to odour extraction, noise insulation, private accessibility and public convenience. Appropriate mitigation measures will include control over hours of opening hours.</u></p> <p>iii. <u>Where appropriate provisions cannot be included then such uses will not be supported, even within designated centres.</u></p> <p><u>Local environmental issues</u></p> <p>iv. <u>All hot food takeaways will require appropriate fume extraction equipment to be installed, retained and maintained to reduce / remove potential nuisance from odours. Extraction systems should be effective in dispersing odours from hot food takeaways, whilst satisfying the council's design policies, especially in areas of historic character.</u></p> <p>v. <u>Such systems should be insulated to a level sufficient to prevent any noise they make from creating adverse impacts for adjacent residents.</u></p>		

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p><u>Disposal of waste products and litter</u></p> <p>vi. <u>Appropriate fat traps / interceptors must be installed on sinks and drains to prevent fat / oil from reaching the wastewater system, to avoid blockages and the subsequent flooding of property.</u></p> <p>vii. <u>Appropriate storage areas must be specified for food waste bins and packaging waste and be included in any new proposal.</u></p> <p>viii. <u>The bins to be provided must be a suitable size and should be stored in a location that will not cause a nuisance to neighbouring residential or commercial properties, including regarding odours and accessibility.</u></p> <p>ix. <u>Commercial bin stores must be contained within the site. Where this is not possible, secure storage structures should be provided, designed to prevent vermin infestation and reduce odours.</u></p> <p><u>Management of Associated Impacts</u></p> <p>x. <u>Proposals for new hot food takeaways will only be granted permission subject to planning conditions addressing matters such as (but not limited to):</u></p> <p>a) <u>opening hours;</u></p> <p>b) <u>parking restrictions;</u></p> <p>c) <u>highway safety;</u></p> <p>d) <u>where it is considered necessary, the installation of or contributions towards monitoring technology such as CCTV.</u></p> <p><u>In some cases, approval may be limited to a personal permission and / or a temporary consent.</u></p> <p>xi. <u>In determining any planning applications for hot food takeaways, the Council will consider any issues concerning community safety, crime, and disorder and will, where necessary, seek advice from the police and other safety organisations.</u></p> <p>Retain supporting text for both policies and repeat after amalgamated policy.</p> <p>Delete extant introductory paragraph for former policy SDM7:</p> <p><i>Management of Hot Food Takeaways</i></p>		

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p>15.61 In addition to Policy SDM6, Policy SDM7 offers guidance on the requirements for the provision of hot food takeaways. Applicants wishing to provide or alter a hot food takeaway unit should ensure they address the issues raised in the policy, which is designed to manage adverse impacts on adjacent residents and properties.</p> <p>Renumber remaining policies etc. accordingly.</p>		
MM75	SDM9.3 (now SDM8)	<p>Amend text:</p> <p>3. <i>Consideration Developments will need to make will be given to the need for the provision for of car parking in line with the requirements set out in Appendix I. Consideration will be given to lower levels of car parking contingent on a robust Transport Assessment or Transport Statement being provided, which association with the development. This will includes an assessment of:</i></p> <p>a. the proximity and availability of public transport facilities;...</p>		No – the proposed modification provides additional clarification on parking standards within the policy. The modification does not change the overall intention of the policy. It therefore does not trigger a change to the conclusions of the HRA.
	SDM9.4 (now SDM8)	<p>Amend text:</p> <p>4. <i>Where a change of use is proposed, Consideration may also be given to the granting of planning permission for a limited period where concerns relating to an application are insufficient to warrant refusal.</i></p>	Clarification	No – the proposed modification relates to minor policy wording changes to provide clarity. The modification does not change the overall intention of the policy. It therefore does not trigger a change to the conclusions of the HRA.
	SDM9.6	Amend text:	Conformity with	No – the proposed modification

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
	(now SDM8)	<p>6. Any proposal that would result in the loss of a public house, social / community club or similar use will be resisted unless there is an alternative venue that can meet similar needs within walking distance, or evidence is provided that the venue is no longer economically viable. This requirement applies equally to community venues that are currently open or that have been closed within the past five years. <u>Lack of viability will need to be demonstrated through the submission of robust evidence. As set out elsewhere in this plan (Policy SDS6), prior to considering any application for its change of use or redevelopment the Council will require robust evidence to be submitted that demonstrates the owners / occupiers have sought to retain the premises in its current or a very similar use. This must include evidence that the facility has been actively and genuinely marketed for 6 – 12 months for its current use (dependant on the nature or complexity of that use or the building itself) and that there has been no interest in either the freehold or leasehold.</u></p> <p>Include new criterion 7 to address loss of social and community uses / facilities:</p> <p>7. <u>The loss of a building identified as providing for local social, community, leisure or similar uses will be resisted unless it can be robustly demonstrated to the satisfaction of the Council that:</u></p> <ul style="list-style-type: none"> a. <u>All reasonable efforts have been made to retain the facility in its current use, including robust active and positive marketing over a minimum six-month period;</u> b. <u>It is no longer required for that specific use, and no alternative community use can be found for it;</u> c. <u>it is being replaced with a community facility of equivalent or better quality / capacity in the local area; or</u> d. <u>it is no longer viable or practical to retain the building and it cannot be adapted or improved to suit.</u> <p><u>This requirement applies equally to community venues that are either still open or that have been closed within the past five years.</u></p> <p>7.8 As part of the design of new community developments ...</p>	<p>national guidance, seeking to protect an integral part of Sandwell's cultural and economic life.</p>	<p>introduces text to clarify policy requirements for evidencing viability and the circumstances in which the loss of community facilities may be permitted. The modification does not change the overall intention of the policy. It therefore does not trigger a change to the conclusions of the HRA.</p>
	Paragraphs 15.82 - 15.83	<p>Include additional justification:</p> <p><i>15.82 Public houses and community centres across Sandwell provide opportunities for social interaction as well as offering locations for the delivery of cultural events and activities. They are publicly accessible community venues and where possible should be retained and supported in their role as part of the social character of the borough. In accordance with NPPF paragraph 87, the loss of existing public houses, community facilities and services will only be permitted in exceptional circumstances, supported by robust evidence to justify the loss in accordance with the criteria set out above. This will help to ensure that all residents continue to have good access to the facilities and services they rely on. Public houses are a notable aspect of the urban and</i></p>	Clarification	No – the proposed modification introduces additional policy justification text for clarification and accordance with the NPPF. It therefore does not trigger a

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?																					
		<p><i>industrial fabric of the borough and are often of significant heritage and architectural merit, as well as serving a community function.</i></p> <p>15.83 <i>Community facilities, such as places of worship and banqueting suites, often create parking problems associated with their use, particularly in residential areas. High levels of on street or inappropriate parking is frequently encountered at particular times of day, or on particular days of the week. Special events, when larger numbers of user are experienced, can exacerbate this situation.</i></p> <p>15.84 <i>Therefore, car parking will be required in accordance with the guidance set out in Appendix I. Subject to robust evidence on predicted levels of generated non-car trips being provided through either a Transport Assessment or Transport Statement as appropriate, lower levels of car parking will be considered in sustainable locations such as near public transport hubs, railway stations and metro stops. Lower levels will also be considered in town centres where sufficient public car parking is available at suitable times without adverse impact on other existing uses.</i></p> <p>Renumber subsequent paragraphs.</p>		change to the conclusions of the HRA.																					
Appendix K (now Appendix I)		<p>Remove 'F1 Places of worship' and 'F2 Hall or meeting place for the principal use of the local community' from Table 2. Add new text and create new Table 3:</p> <p>Table 2: Maximum Parking Standards for Non-Residential Uses</p> <table border="1"> <thead> <tr> <th>Use Class</th> <th>Description</th> <th>Baseline Parking Level Parking Standards per m²</th> </tr> </thead> <tbody> <tr> <td>...</td> <td></td> <td></td> </tr> <tr> <td colspan="3">Class F1 - Learning and Non-Residential Institutions</td> </tr> <tr> <td>...</td> <td></td> <td></td> </tr> <tr> <td>F1</td> <td>Places of Worship</td> <td>1:5</td> </tr> <tr> <td colspan="3">Class F2 - Local Community Uses</td> </tr> <tr> <td>...</td> <td></td> <td></td> </tr> </tbody> </table>	Use Class	Description	Baseline Parking Level Parking Standards per m ²	...			Class F1 - Learning and Non-Residential Institutions			...			F1	Places of Worship	1:5	Class F2 - Local Community Uses			...			Update and clarification	No – the proposed modification updates and restructures supporting information relating to parking standards, providing clarity in relation to supporting transport policies in the Plan. It therefore does not trigger a change to the conclusions of the HRA.
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Ref	Page / paragraph / policy reference	Proposed change				Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?						
			<i>F2</i>	<i>Hall or meeting place for the principal use of the local community</i>	<i>1:30</i>								
		<p><u>Community Facilities</u></p> <p><u>The parking requirements for places of worship and community facilities require different considerations due to the particular patterns of demand that they create. The following standards have been derived from extensive practice, evidence gathering, benchmarking and feedback from previous schemes. Lower levels of car parking will only be permitted if fully evidenced through a Transport assessment or Transport statement, as appropriate.</u></p> <p><u>Table 3: Minimum parking standards for Community Uses</u> <u>(Table 3 will be applied to the total floor area on all applications including change of use applications)</u></p> <table border="1"> <thead> <tr> <th><u>Use Class</u></th><th><u>Description</u></th><th><u>Parking Requirement spaces per m²</u></th></tr> </thead> <tbody> <tr> <td><i>F1</i></td><td><i>Places of worship</i></td><td><i>1:5</i></td></tr> <tr> <td><i>F2</i></td><td><i>Hall or meeting place for the principal use of the local community</i></td><td><i>1:30</i></td></tr> </tbody> </table> <p><u>Developments in Town Centres</u></p> <p><u>Parking requirements for developments ...</u></p>	<u>Use Class</u>	<u>Description</u>	<u>Parking Requirement spaces per m²</u>	<i>F1</i>	<i>Places of worship</i>	<i>1:5</i>	<i>F2</i>	<i>Hall or meeting place for the principal use of the local community</i>	<i>1:30</i>		
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<i>F1</i>	<i>Places of worship</i>	<i>1:5</i>											
<i>F2</i>	<i>Hall or meeting place for the principal use of the local community</i>	<i>1:30</i>											
MM76	SDM10.2 (now SDM9)	Amend for clarity: ... to utilise existing street furniture, <u>and should</u> not add to the clutter of the street scene, ...				Correction and clarification	No – the proposed modification relates to minor policy wording changes to provide clarity. The modification does not change the overall intention of the policy.						

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
	SDM10.3 (now SDM9)	Delete criterion: <i>3. The use of Article 4 directions removing permitted development rights for telecommunication development will be considered where there is a serious risk to amenity.</i>	Correction	It therefore does not trigger a change to the conclusions of the HRA.
MM77	Appendix B Appendix C	Deletion of Appendices B and C Creation of new chapters in SLP for all strategic and non-strategic site allocations. The titles of Appendices B and C to be changed as follows: <u>Appendix B Chapter 16 – Strategic Site Allocations</u> <u>Appendix C Chapter 17 – Non-strategic Site Allocations.</u> Allocations from Appendices B and C that are proposed as Strategic Allocations will be combined in Chapter 16 and the allocations that are non-strategic allocations will be combined in Chapter 17 Consequential amendments to other appendices and referencing of them will be made throughout SLP.	Creation of new chapters following discussion at examination on strategic site identification.	No – the proposed modification moves site allocation details from Appendices B and C into the main body of the Plan at Chapters 16 and 17. It therefore does not trigger a change to the conclusions of the HRA.
MM78	Paragraphs 16.1 – 16.5	Insert new text: <u>Chapter 16 – Strategic Site Allocations</u>	Identification of strategic	No – the proposed modification inserts an introductory

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p><i><u>Introduction</u></i></p> <p>16.1. <i>This chapter identifies strategic housing, employment and mixed-use allocations across the plan period, to provide a clear and deliverable framework for growth in Sandwell. This ensures that the spatial strategy for growth is delivered in a coordinated, sustainable, and infrastructure-led manner.</i></p> <p>16.2. <i>The selection of sites was informed by a comprehensive site assessment methodology, which applied a consistent and transparent framework to assess the suitability, availability, and achievability of potential housing, employment and mixed-use sites. This process considered a range of planning and environmental factors, including whether the land was previously developed, access to services and sustainable transport, the capacity of existing and planned infrastructure, flood risk, and potential effects on biodiversity and geodiversity. The assessment drew upon a robust evidence base, including the Sandwell Housing Market Assessment, Black Country Economic Development Needs Assessment, Black Country Employment Area Review, Sustainability Appraisal, and Strategic Flood Risk Assessment, as well as engagement with infrastructure providers and key stakeholders. Sites were also assessed for their potential impacts on heritage assets, which were taken into account when a decision was taken on their allocation.</i></p> <p>16.3. <i>The delivery of the allocations will be monitored through the Council's Annual Monitoring Report and housing trajectory to try to ensure that planned growth is achieved in a timely and sustainable manner. Where necessary, the Council will work proactively with developers, infrastructure providers, and delivery partners to overcome barriers to delivery and to ensure that housing provision remains aligned with the overall vision and objectives of the Local Plan.</i></p> <p>16.4. <i>The inclusion of a site as a strategic allocation does not remove the need for planning permission. A planning application should be in accordance with the site-specific allocation policy as well as all other relevant development plan policies.</i></p> <p><i><u>Strategic Housing Allocations</u></i></p> <p>16.5 <i>Strategic housing sites are defined as individual housing sites or masterplan areas capable of delivering over 500 dwellings. These sites represent a significant proportion of the planned housing growth in the borough and are critical to achieving housing requirement of the Local Plan.</i></p>	allocations - clarification	paragraph to the Strategic Site Allocations. It therefore does not trigger a change to the conclusions of the HRA.
MM79	New policy SSH1	<p>Include strategic allocation:</p> <p><i><u>Policy SSH1 – Edwin Richards Quarry</u></i></p> <p>16.6. <i>The site lies within Rowley Regis in the southwestern part of the borough. It is bordered to the north by Turners Hill and Dudley Golf Course, to the east by Portway Road, to the south by the B4171</i></p>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic allocation policy. The site

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
		<p><u>Dudley Road, with horse paddocks and extensive areas of housing to the southeast, and by further housing to the southwest. The site in its entirety is brownfield land and comprises an extensive former dolerite quarry, part of which has been infilled with municipal, commercial and industrial waste.</u></p> <p><u>Policy SSH1 – Edwin Richards Quarry</u></p> <table border="1"> <tr> <td><u>Location</u></td><td><u>Edwin Richards Quarry, Portway Road, Rowley Regis</u></td></tr> <tr> <td><u>Gross Site Area (Ha)</u></td><td><u>52</u></td></tr> <tr> <td><u>Indicative Net Developable Area (Ha)</u></td><td><u>15</u></td></tr> <tr> <td><u>Indicative Capacity (and Completion Year)</u></td><td><u>628 homes (2027-2041) and an additional 150 homes post plan period</u></td></tr> </table>  <p>SSH1 - Edwin Richards Quarry - Strategic Housing Allocation</p> <p><small>© Lepus Consulting 2024</small></p>	<u>Location</u>	<u>Edwin Richards Quarry, Portway Road, Rowley Regis</u>	<u>Gross Site Area (Ha)</u>	<u>52</u>	<u>Indicative Net Developable Area (Ha)</u>	<u>15</u>	<u>Indicative Capacity (and Completion Year)</u>	<u>628 homes (2027-2041) and an additional 150 homes post plan period</u>		allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.
<u>Location</u>	<u>Edwin Richards Quarry, Portway Road, Rowley Regis</u>											
<u>Gross Site Area (Ha)</u>	<u>52</u>											
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		<p><u>Site constraints</u></p> <ul style="list-style-type: none"> <u>The site comprises an extensive former dolerite quarry, part of which has been infilled with non-hazardous municipal, commercial and industrial waste. Landfill operations remain active, and are likely to continue in some form until their expiry date in February 2042.</u> <u>The northeastern part of the site is heavily covered with trees.</u> <u>The ground has been engineered, creating a series of man-made plateaus.</u> <u>A small proportion of the site along the southern boundary falls within a Site of Local Importance for Nature Conservation (SLINC). The southwestern corner is designated as a wildlife corridor and as strategic open space.</u> <p><u>Successful development of the site will require:</u></p> <ol style="list-style-type: none"> <u>the preparation of a comprehensive masterplan in consultation with the Council, which responds to the Council's design code (Policy SDS5);</u> <u>The protection and enhancement of nature conservation sites (Policy SNE1);</u> <u>the waste disposal operational capacity of Edwin Richards Landfill to be maintained unless criteria in Policy SWA2 are met; and</u> <u>proposals for housing and other potentially sensitive uses not to conflict with waste disposal operations at Edwin Richards Landfill (Policy SWA2).</u> 		
MM80	New policy SSH2	<p>Include strategic allocation:</p> <p><u>Policy SSH2 – Friar Park</u></p> <p>16.7. <u>The site is located in the north of Sandwell close to the borough boundary with Walsall. It comprises a former sewage farm, together with former farmland that has mostly been restored as open space. The site has had previous land uses; however, it now has the character of a greenfield site.</u></p> <p>16.8. <u>To the south and west of the site is Friar Park, a large residential estate with associated facilities, and football facility. Bescot Local Distribution Centre (railway sidings) and the Birmingham to Wolverhampton railway line are located to the north and northeast, beyond which is the River Tame and the elevated M6 motorway. To the east is Sandy Lane, beyond which is the A4031 (Walsall Road) and Tame Bridge Parkway railway station.</u></p>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic allocation policy. The site allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
		<p><u>Policy SSH2 – Friar Park</u></p> <table border="1" data-bbox="455 441 1646 715"> <tr> <td data-bbox="455 441 788 477"><u>Location</u></td><td data-bbox="788 441 1646 477"><u>Friar Park Urban Village, Friar Park Road, Wednesbury</u></td></tr> <tr> <td data-bbox="455 477 788 514"><u>Gross Site Area (Ha)</u></td><td data-bbox="788 477 1646 514"><u>26.62</u></td></tr> <tr> <td data-bbox="455 514 788 599"><u>Indicative Net Developable Area (Ha)</u></td><td data-bbox="788 514 1646 599"><u>15.75</u></td></tr> <tr> <td data-bbox="455 599 788 715"><u>Indicative Capacity (and Completion Year)</u></td><td data-bbox="788 599 1646 715"><u>614 homes (2028-2036)</u></td></tr> </table>  <p>SSH2 - Friar Park - Strategic Housing Allocation</p> <p> Sandwell Metropolitan Borough Council</p> <p>© Copyright Ministry of Housing, Communities and Local Government 2024 and onward</p> <p><u>Site constraints</u></p>	<u>Location</u>	<u>Friar Park Urban Village, Friar Park Road, Wednesbury</u>	<u>Gross Site Area (Ha)</u>	<u>26.62</u>	<u>Indicative Net Developable Area (Ha)</u>	<u>15.75</u>	<u>Indicative Capacity (and Completion Year)</u>	<u>614 homes (2028-2036)</u>		Modifications HRA Report.
<u>Location</u>	<u>Friar Park Urban Village, Friar Park Road, Wednesbury</u>											
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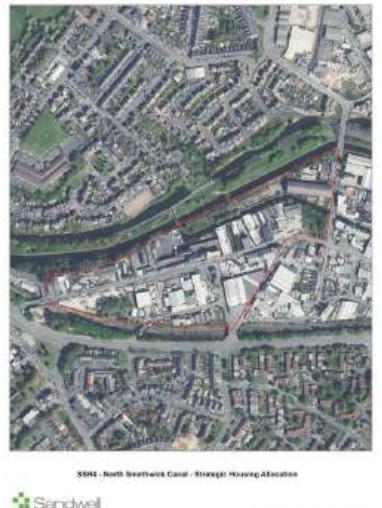
Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<ul style="list-style-type: none"> <u>Five sports pitches (four youth 11v11 football pitches and one adult football pitch) are located on the site, all of which are recorded as lapsed in the Playing Pitch and Outdoor Sports Strategy (2022).</u> <u>Over half the site area is designated as a Site of Local Importance for Nature Conservation (SLINC).</u> <u>A small proportion of the northeastern corner of the sites lies within Flood Zone 2.</u> <u>Previous uses at the site mean that contaminated land and made ground is present, particularly in the area of the former sewage works.</u> <u>Bescot Local Distribution Centre (railway sidings) to the north and northwest of the site is a train stabling depot and aggregates logistics site.</u> <p><u>Successful development of the site will require:</u></p> <ol style="list-style-type: none"> <u>general conformity with Friar Park Urban Village Masterplan (2023);</u> <u>that existing playing fields are not built on unless a mitigation package is agreed in accordance with NPPF paragraph 103 (Policy SHW5);</u> <u>an appropriate remediation strategy to be agreed and implemented with relevant stakeholders to address contamination issues (Policy SCO3); and</u> <u>damage to the designated SLINC to be minimised, and full mitigation secured to address any remaining impact on the SLINC (Policy SNE1).</u> 		
MM81	New policy SSH3	<p>Include strategic allocation:</p> <p><u>Policy SSH3 – Rattlechain and Land between Addington Way and River Tame</u></p> <p>16.9. <u>This strategic allocation comprises land north of Temple Way and land between Addington Way and River Tame, which lies approximately 1.8km northwest of Oldbury Town Centre. To the south of the site is the large Temple Way residential estate. To the west is a variety of industrial and employment uses including metal fabricators and cleared land used for open storage and vehicle parking. To the north is the Birmingham Main Line Canal with the Birmingham to Wolverhampton railway line running parallel, beyond which is Sheepwash Nature Reserve. To the east is the River Tame and an area of open space that accommodates areas of woodland. The Gower Branch Canal lies further to the east.</u></p> <p>16.10. <u>The site has a complex history, having been used previously for coal mining, as a brick works and clay pit, a tip for fuel ash and commercial waste, and as a deposit for phosphorous waste. Presently the western third of the site comprises a lagoon, which is formed of a main body of water and a smaller</u></p>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic allocation policy. The site allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
		<p><u>ancillary body of water adjacent to the west. The lagoon is approximately 20 metres deep and accommodates the deposits of phosphorous waste, which is monitored through a Waste Management Licence.</u></p> <p>16.11. <u>The remainder of the allocation accommodates deposits of fuel ash and commercial waste and outwardly comprises a variety of scrubland, grassland and small patches of woodland. The land is undulating, and in the main is higher in elevation than the residential estate to the south, with steep drops particularly down to the River Tame along the eastern boundary.</u></p> <p>16.12. <u>Despite accommodating previous land uses, the site appears predominantly as greenfield land; due to previous restoration efforts it does not meet the NPPF definition of previously developed land. In addition, at present the site does not meet the definition of 'contaminated land' under Part IIa Environmental Protection Act 1990.</u></p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><u>Policy SSH3 – Rattlechain and Land between Addington Way and River Tame</u></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; padding: 5px;"><u>Location</u></td> <td style="width: 70%; padding: 5px;"><u>Land to the north of Temple Way & Land between Addington Way and River Tame – Tividale</u></td> </tr> <tr> <td style="width: 30%; padding: 5px;"><u>Gross Site Area (Ha)</u></td> <td style="width: 70%; padding: 5px;"><u>15.72</u></td> </tr> <tr> <td style="width: 30%; padding: 5px;"><u>Indicative Net Developable Area (Ha)</u></td> <td style="width: 70%; padding: 5px;"><u>15.72</u></td> </tr> <tr> <td style="width: 30%; padding: 5px;"><u>Indicative Capacity (and Completion Year)</u></td> <td style="width: 70%; padding: 5px;"><u>554 homes (2034-2041)</u></td> </tr> </table> </div>	<u>Location</u>	<u>Land to the north of Temple Way & Land between Addington Way and River Tame – Tividale</u>	<u>Gross Site Area (Ha)</u>	<u>15.72</u>	<u>Indicative Net Developable Area (Ha)</u>	<u>15.72</u>	<u>Indicative Capacity (and Completion Year)</u>	<u>554 homes (2034-2041)</u>		Modifications HRA Report.
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		 <p>Site constraints</p> <ul style="list-style-type: none"> <u>Although majority of the site is within Flood Zone 1 and at low risk of flooding, land around the River Tame in the east of the site is within Flood Zone 2 and 3.</u> <u>The topography of the site falls sharply down to the river, which is within a steep valley.</u> <u>Several canal towpath bridges close to the site are listed as Grade II, including at the junction with the Gower Branch Canal (300 metres to the east), and at the Dudley Port Junction (750 metres to the west).</u> <u>Ground contamination and stability issues, including resulting from previous uses of the site for coal mining, as a brick works and clay pit, a tip for fuel ash and commercial waste, and as a deposit for phosphorous waste.</u> <u>A small proportion of the site is designated as a Site of Local Importance for Nature Conservation (SLINC).</u> 		

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<ul style="list-style-type: none"> <u>There are several mature trees within the site.</u> <u>National Grid gas mains and overhead electric pylons are present on site.</u> <p><u>Successful development of the site will require:</u></p> <ol style="list-style-type: none"> <u>the preparation of a comprehensive masterplan in consultation with the Council, which responds to the Sandwell Design Code (Policy SDS5);</u> <u>the Exception Test to be passed if all built development is not steered to areas of Flood Zone 1 (Policy SCC5);</u> <u>an appropriate remediation strategy to be agreed and implemented with relevant stakeholders to address contamination issues (Policy SCO3);</u> <u>damage to the designated SLINC to be minimised, and full mitigation secured to address any remaining impact on the SLINC (Policy SNE1);</u> <u>ensuring development protects and enhances the significance of heritage assets and their settings (Policy SHE1);</u> <u>provision of acceptable vehicular access routes and integration with the surrounding sustainable transport network for vehicles, cyclists and pedestrians (Policy STR5);</u> <u>a strategy for responding to the NGET overhead transmission lines and any underground cables present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage and how the impact of the assets has been reduced through good design; and</u> <u>development to protect and enhance the character, nature conservation value, water quality, structural stability and recreational usage of the canal network (Policy SNE6).</u> 		
MM82	New policy SSH4	<p>Include strategic allocation:</p> <p><u>Policy SSH4 – North Smethwick Canalside</u></p> <p>16.13. <u>The site is one of the key regeneration sites identified within the Smethwick to Birmingham Corridor Framework. It is a brownfield site and is situated to the south of the Birmingham Canal on either side of Rolfe Street. To the south lies the Birmingham to Wolverhampton railway line and the A457 (Tollhouse Way). The area consists of several industrial buildings offering a range of uses including motor repairs, window manufacture, building materials, a hostel, a banqueting suite and vacant buildings. Smethwick</u></p>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic allocation policy. The site allocation was assessed in the

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?										
		<p><u>Rolfe Street railway station lies to the west of the site and offers regular train services between Wolverhampton and Birmingham New Street. There is an approved Rolfe Street Masterplan in place that will guide future development in the area.</u></p> <table border="1"><thead><tr><th colspan="2"><u>Policy SSH4 – North Smethwick Canalside</u></th></tr></thead><tbody><tr><td><u>Location</u></td><td><u>North Smethwick Canalside, Smethwick</u></td></tr><tr><td><u>Gross Site Area (Ha)</u></td><td><u>8.77</u></td></tr><tr><td><u>Indicative Net Developable Area (Ha)</u></td><td><u>6.57</u></td></tr><tr><td><u>Indicative Capacity (and Completion Year)</u></td><td><u>500 homes (2029-2038)</u></td></tr></tbody></table>	<u>Policy SSH4 – North Smethwick Canalside</u>		<u>Location</u>	<u>North Smethwick Canalside, Smethwick</u>	<u>Gross Site Area (Ha)</u>	<u>8.77</u>	<u>Indicative Net Developable Area (Ha)</u>	<u>6.57</u>	<u>Indicative Capacity (and Completion Year)</u>	<u>500 homes (2029-2038)</u>		Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.
<u>Policy SSH4 – North Smethwick Canalside</u>														
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Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		 <p>Site constraints</p> <ul style="list-style-type: none"> <u>The site is adjacent to the Birmingham to Wolverhampton railway line.</u> <u>The site is adjacent to the Birmingham Mainline canal.</u> <u>The site lies partly within the Smethwick Summit Galton Bridge Conservation Area; there are listed structures within and adjacent to the site including a Grade II listed wall and the Grade II* Engine Arm Aqueduct, which is also a scheduled ancient monument.</u> <u>There is a possibility of structures buried underground, including water wells at the site of the former Rolfe Street Baths.</u> <u>The site contains existing industrial, employment and other uses.</u> <p>Successful development of the site will require:</p>		

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<ul style="list-style-type: none"> a) <i>general conformity with the Urban Design Framework and Character and Design information set out in the Rolfe Street Masterplan (2023);</i> b) <i>investigating, and where appropriate, the protecting of important archaeological assets (Policy SHE4);</i> c) <i>safeguarding the amenity of future residents from the possible impact of noise, particularly from the adjacent railway line (Policy SCO2);</i> d) <i>ensuring development protects and enhances the significance of heritage assets and their settings (Policy SHE1);</i> e) <i>development to protect and enhance the character, nature conservation value, water quality, structural stability and recreational usage of the canal network (Policy SNE6).</i> 		
MM83	New paragraphs 16.14 – 16.15	<p>Insert introductory text for Grove Lane Masterplan sites:</p> <p><i>Grove Lane Masterplan Sites</i></p> <p>16.14. <i>The Grove Lane Masterplan includes six sites that will deliver a substantive amount of housing and will collectively provide strategic benefits. Such benefits include the regeneration of key areas within Smethwick, and contributions to the creation of sustainable communities that support the wider spatial vision for the borough. These are brownfield sites within the Smethwick Regeneration Area, which seek to redevelop existing low quality employment land to residential uses and complement the recent significant investment by Sandwell and West Birmingham NHS Trust in the new Midland Metropolitan University Hospital and associated Learning Campus. The area forms part of the Smethwick to Birmingham Corridor, which follows the route of the Birmingham Main Line Canal.</i></p> <p>16.15. <i>The Grove Lane Masterplan proposes the development of a new two-form entry primary school as part of the development of the Grove Lane Area. However, the Infrastructure Development Plan that was produced for the Sandwell Local Plan subsequently did not identify any need for additional mainstream schools within the borough across the plan period. Any requirement for a new school should be revisited and fully assessed as proposals progress.</i></p>	Identification of strategic allocations - clarification	No – the proposed modification inserts introductory text for the Grove Lane Masterplan sites. It does not trigger a change to the conclusions of the HRA.
MM84	New policy SSH5	<p>Include strategic allocation:</p> <p><i>Policy SSH5 – Abberley Street</i></p> <p>16.16. <i>The site lies to the south of Cranford Street, with Winson Street to the east, Abberley Street to the south and the Cape Arm site to the west. The site is divided into two distinct areas with an existing</i></p>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic allocation policy. The site

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
		<p><u><i>brick-built building on the northern portion. The building has been sub-divided into smaller units with small scale employment uses operating from the majority of them. To the south fronting Abberley Street, the site includes derelict and dilapidated former industrial units with some vacant land.</i></u></p> <p>SH5 – Abberley Street</p> <table border="1"><tr><td>on</td><td>Abberley Street, Smethwick</td></tr><tr><td>Site Area (Ha)</td><td>2.48</td></tr><tr><td>Net Developable Area</td><td>1.86</td></tr><tr><td>Capacity (and Creation Year)</td><td>140 homes (2028-2033)</td></tr></table>	on	Abberley Street, Smethwick	Site Area (Ha)	2.48	Net Developable Area	1.86	Capacity (and Creation Year)	140 homes (2028-2033)		allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.
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Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
				
		<p><u>Site constraints</u></p> <ul style="list-style-type: none"> • <u>Possible contamination issues due to past industrial activity</u> • <u>A canal arm previously passed through the western part of the site and its former route is designated as a Wildlife Corridor</u> • <u>The site comprises active industrial and employment uses as well as derelict and dilapidated former industrial units.</u> 		
		<p><u>Successful development of the site will require:</u></p> <ol style="list-style-type: none"> a) <u>general conformity with the Key Principles set out in the Grove Lane Masterplan (Character Area 6).</u> b) <u>the movement of wildlife to be protected and enhanced (Policy SNE1).</u> 		
MM85	New policy SSH6	Include strategic allocation: <u>Policy SSH6 – Cape Arm Cranford Street</u>	Identification of strategic	Yes – the proposed modification

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
		<p>16.17. <u>The site is bounded by Cranford Street to the north and Cape Arm canal to the south. It comprises a vacant site, covered with a concrete slab that was used as a car park / compound for the construction of the new Midland Metropolitan University Hospital. Derelict buildings front Cranford Street and Abberley Street.</u></p> <p><u>Policy SSH6 – Cape Arm Cranford Street</u></p> <table> <tr> <td><u>Location</u></td><td><u>Cape Arm, Cranford Street, Smethwick</u></td></tr> <tr> <td><u>Gross Site Area (Ha)</u></td><td><u>2.42</u></td></tr> <tr> <td><u>Indicative Net Developable Area (Ha)</u></td><td><u>2.13</u></td></tr> <tr> <td><u>Indicative Capacity (and Completion Year)</u></td><td><u>120 homes</u></td></tr> </table>	<u>Location</u>	<u>Cape Arm, Cranford Street, Smethwick</u>	<u>Gross Site Area (Ha)</u>	<u>2.42</u>	<u>Indicative Net Developable Area (Ha)</u>	<u>2.13</u>	<u>Indicative Capacity (and Completion Year)</u>	<u>120 homes</u>	allocations - clarification	introduces a new strategic allocation policy. The site allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.
<u>Location</u>	<u>Cape Arm, Cranford Street, Smethwick</u>											
<u>Gross Site Area (Ha)</u>	<u>2.42</u>											
<u>Indicative Net Developable Area (Ha)</u>	<u>2.13</u>											
<u>Indicative Capacity (and Completion Year)</u>	<u>120 homes</u>											

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		 <p>SSHA - Cape Area Cranwell Street - Strategic Housing Allocation</p> <p> Sandwell Metropolitan Borough Council</p> <p>(C) Copyright Dudley Metropolitan Borough Council 2021 and onward</p>		
		<p><u>Site constraints</u></p> <ul style="list-style-type: none"> <u>Possible contamination issues due to past industrial activity</u> <u>The canal passes through the western and southern edge of the site.</u> <u>A proportion of the site is designated as a wildlife corridor.</u> <u>There are existing buildings on site.</u> 		
	<p><u>Successful development of the site will require:</u></p> <ol style="list-style-type: none"> <u>general conformity with the Key Principles set out in the Grove Lane Masterplan (Character Area 2).</u> <u>development to protect and enhance the character, nature conservation value, water quality, structural stability and recreational usage of the canal network (Policy SNE6); the movement of wildlife to be protected and enhanced (Policy SNE1); and</u> 			

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
		c) <i>support for the creation of a green link and active travel route from the Midland Metropolitan University Hospital to Cranford Street (Policy STR5).</i>										
MM86	New policy SSH7	<p>Include strategic allocation:</p> <p><i>Policy SSH7 – Cranford Street / Heath Street / Canal</i></p> <p>16.18. <i>The site lies to the north of Cranford Street with the Cape Arm canal to the west and the Birmingham Main Line Canal to the immediate north. The borough boundary with Birmingham lies to the east of the site. Currently most of the site is occupied by older industrial buildings, in use as a factory distribution centre. The remainder of the site accommodates newer, smaller individual industrial units for a range of uses including food distribution, home improvements and motor repairs and testing centre. A cycle route leading from the canal towpath through to Cranford Street has recently been created.</i></p> <p><i>Policy SSH7 – Cranford Street / Heath Street / Canal</i></p> <table border="1"> <tr> <td><u>Location</u></td><td><i>Cranford Street / Heath Street / Canal, Smethwick</i></td></tr> <tr> <td><u>Gross Site Area (Ha)</u></td><td><i>3.00</i></td></tr> <tr> <td><u>Indicative Net Developable Area (Ha)</u></td><td><i>2.88</i></td></tr> <tr> <td><u>Indicative Capacity (and Completion Year)</u></td><td><i>115 homes (2028-2031)</i></td></tr> </table>	<u>Location</u>	<i>Cranford Street / Heath Street / Canal, Smethwick</i>	<u>Gross Site Area (Ha)</u>	<i>3.00</i>	<u>Indicative Net Developable Area (Ha)</u>	<i>2.88</i>	<u>Indicative Capacity (and Completion Year)</u>	<i>115 homes (2028-2031)</i>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic allocation policy. The site allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.
<u>Location</u>	<i>Cranford Street / Heath Street / Canal, Smethwick</i>											
<u>Gross Site Area (Ha)</u>	<i>3.00</i>											
<u>Indicative Net Developable Area (Ha)</u>	<i>2.88</i>											
<u>Indicative Capacity (and Completion Year)</u>	<i>115 homes (2028-2031)</i>											

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		 <p>SSHT - Cranford Street & Mouth River & Canal - Strategic Housing Allocation</p> <p> Sandwell Metropolitan Borough Council</p> <p>© Copyright Ministry of Housing, Communities and Local Government 2024 and Crown</p> <p><u>Site constraints</u></p> <ul style="list-style-type: none"> <u>The northern part of the site along the canal is within the Smethwick Summit Galton Valley Conservation Area.</u> <u>The Birmingham Main Line Canal and Cape Arm are designated as a Wildlife Corridor.</u> <u>Parts of the canal basin are within Flood Zone 2 and 3. Parts of the wider site are at risk of surface water flooding.</u> <u>Possible contamination issues could be present due to past industrial activity.</u> <u>The site comprises occupied industrial buildings and a car park.</u> <p><u>Successful development of the site will require:</u></p> <ol style="list-style-type: none"> <u>general conformity with the Key Principles set out in the Grove Lane Masterplan (Character Area 1).</u> 		

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
		<p>b) <i>development to protect and enhance the character, nature conservation value, water quality, structural stability and recreational usage of the canal network (Policy SNE6); the movement of wildlife to be protected and enhanced (Policy SNE1).</i></p> <p>c) <i>ensuring development protects and enhances the significance of heritage assets and their settings (Policy SHE1).</i></p> <p>d) <i>development to reduce the risk of surface water flooding (Policies SCC5 and SCC6).</i></p>										
MM87	New policy SSH8	<p>Include strategic allocation:</p> <p><i>Policy SSH8 – Grove Lane / Cranford Street / London Street</i></p> <p>16.19. <i>The site is triangular in shape and bounded by Cranford Street to the north, Grove Lane to the south and London Street to the east. There are multiple land uses within this area including light industrial, motor repairs, van hire, petrol station and vacant buildings. Many of the structures are older industrial premises although there are more recent additions / extensions to some buildings. This site lies adjacent to the new Midland Metropolitan University Hospital.</i></p> <p><i>Policy SSH8 – Grove Lane / Cranford Street / London Street</i></p> <table border="1"> <tr> <td><i>Location</i></td><td><i>Grove Lane / Cranford Street / London Street, Smethwick</i></td></tr> <tr> <td><i>Gross Site Area (Ha)</i></td><td><i>2.04</i></td></tr> <tr> <td><i>Indicative Net Developable Area (Ha)</i></td><td><i>2.04</i></td></tr> <tr> <td><i>Indicative Capacity (and Completion Year)</i></td><td><i>500 homes (2026-2032)</i></td></tr> </table>	<i>Location</i>	<i>Grove Lane / Cranford Street / London Street, Smethwick</i>	<i>Gross Site Area (Ha)</i>	<i>2.04</i>	<i>Indicative Net Developable Area (Ha)</i>	<i>2.04</i>	<i>Indicative Capacity (and Completion Year)</i>	<i>500 homes (2026-2032)</i>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic allocation policy. The site allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.
<i>Location</i>	<i>Grove Lane / Cranford Street / London Street, Smethwick</i>											
<i>Gross Site Area (Ha)</i>	<i>2.04</i>											
<i>Indicative Net Developable Area (Ha)</i>	<i>2.04</i>											
<i>Indicative Capacity (and Completion Year)</i>	<i>500 homes (2026-2032)</i>											

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
				
		<p><u>Site constraints</u></p> <ul style="list-style-type: none"> • <u>Possible contamination issues due to past industrial activity.</u> • <u>The site comprises occupied industrial buildings and premises.</u> <p><u>Successful development of the site will require:</u></p> <p>a) <u>general conformity with the Key Principles set out in the Grove Lane Masterplan (Character Area 7).</u></p>		
MM88	New policy SSH9	<p>Include strategic allocation:</p> <p><u>Policy SSH9 – Grove Street / MMUH</u></p> <p>16.20. <u>The site is bordered by Grove Street to the west, Dudley Road to the south, Halberton Street and Dugdale Streets to the east and Abberley Street to the north. Comprising mainly older industrial premises in poor condition, the buildings accommodate a range of uses including car repairs, sales.</u></p>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic allocation policy. The site

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
		<p><i>offices, a coach company and a mosque. The new Midland Metropolitan University Hospital lies immediately to the west of this site.</i></p> <p><i>Policy SSH9 – Grove Street / MMUH</i></p> <table border="1"> <tr> <td><i>Location</i></td><td><i>Grove Street, Smethwick</i></td></tr> <tr> <td><i>Gross Site Area (Ha)</i></td><td><i>2.18</i></td></tr> <tr> <td><i>Indicative Net Developable Area (Ha)</i></td><td><i>2.18</i></td></tr> <tr> <td><i>Indicative Capacity (and Completion Year)</i></td><td><i>85 homes and a two-form entry primary school (2029-2031)</i></td></tr> </table>  <p><small>SSH9 - Grove Street / MMUH School - Strategic Housing Allocation Sandwell Metropolitan Borough Council © Copyright Sandwell Metropolitan Borough Council 2024 and beyond</small></p> <p><i>Site constraints</i></p>	<i>Location</i>	<i>Grove Street, Smethwick</i>	<i>Gross Site Area (Ha)</i>	<i>2.18</i>	<i>Indicative Net Developable Area (Ha)</i>	<i>2.18</i>	<i>Indicative Capacity (and Completion Year)</i>	<i>85 homes and a two-form entry primary school (2029-2031)</i>		allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.
<i>Location</i>	<i>Grove Street, Smethwick</i>											
<i>Gross Site Area (Ha)</i>	<i>2.18</i>											
<i>Indicative Net Developable Area (Ha)</i>	<i>2.18</i>											
<i>Indicative Capacity (and Completion Year)</i>	<i>85 homes and a two-form entry primary school (2029-2031)</i>											

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?										
		<ul style="list-style-type: none"> <u>Possible contamination issues due to past industrial activity.</u> <u>The site comprises occupied industrial buildings and premises.</u> <p><u>Successful development of the site will require:</u></p> <ol style="list-style-type: none"> <u>general conformity with the Key Principles set out in the Grove Lane Masterplan (Character Area 4); and</u> <u>the requirement for a new school as part of the delivery of the Grove Lane Masterplan to be revisited and fully assessed; and</u> <u>taking account of possible future redevelopment of Moilliett Street Park in Birmingham as envisaged by the Smethwick to Birmingham Corridor Framework.</u> 												
MM89	New policy SSH10	<p>Include strategic allocation:</p> <p><u>Policy SSH10 – Moilliett Street Park</u></p> <p>16.21 <u>The site is partially in Sandwell but also includes Moilliett Park, which is located within Birmingham City. The site lies to the north of Dudley Road, which is an established retail centre in Birmingham, with Halberton Street to the west, Winson Street to the east and lying to the south of Abberley Street. The site currently comprises old industrial buildings and Moilliett Park. The part of the site within Sandwell is allocated as SSH10.</u></p> <table border="1"> <thead> <tr> <th colspan="2"><u>Policy SSH10 – Moilliett Street Park</u></th> </tr> </thead> <tbody> <tr> <td><u>Location</u></td><td><u>Moilliett Street Park, Smethwick</u></td></tr> <tr> <td><u>Gross Site Area (Ha)</u></td><td><u>0.77</u></td></tr> <tr> <td><u>Indicative Net Developable Area (Ha)</u></td><td><u>0.77</u></td></tr> <tr> <td><u>Indicative Capacity (and Completion Year)</u></td><td><u>35 homes (2029-2030)</u></td></tr> </tbody> </table>	<u>Policy SSH10 – Moilliett Street Park</u>		<u>Location</u>	<u>Moilliett Street Park, Smethwick</u>	<u>Gross Site Area (Ha)</u>	<u>0.77</u>	<u>Indicative Net Developable Area (Ha)</u>	<u>0.77</u>	<u>Indicative Capacity (and Completion Year)</u>	<u>35 homes (2029-2030)</u>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic allocation policy. The site allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.
<u>Policy SSH10 – Moilliett Street Park</u>														
<u>Location</u>	<u>Moilliett Street Park, Smethwick</u>													
<u>Gross Site Area (Ha)</u>	<u>0.77</u>													
<u>Indicative Net Developable Area (Ha)</u>	<u>0.77</u>													
<u>Indicative Capacity (and Completion Year)</u>	<u>35 homes (2029-2030)</u>													

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		 <p>SSHP3 - Moillett Street Park - Strategic Housing Allocation</p> <p>© Copyright Bury Council 2010 2024 and onward</p> <p><u>Site constraints</u></p> <ul style="list-style-type: none"> <u>Possible contamination and ground issues due to past industrial activity.</u> <u>The site comprises occupied industrial buildings.</u> <p><u>Successful development of the site will require:</u></p> <ol style="list-style-type: none"> <u>general conformity with the Key Principles set out in the Grove Lane Masterplan (Character Area 5); and</u> <u>taking account of possible future redevelopment of Moillett Street Park in Birmingham as envisaged by the Smethwick to Birmingham Corridor Framework.</u> 		
MM90	New paragraph 16.20	<p>Insert introductory text for strategic mixed use allocation sites:</p> <p><i>Strategic Mixed Used Allocations</i></p>	Identification of strategic	No – the proposed modification relates to introductory text for

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<u><i>These are mixed used allocations capable of delivering substantive number of dwellings as well as employment development and other development uses and includes sites identified in the West Bromwich Masterplan.</i></u>	allocations - clarification	the mixed-use strategic allocations. It does not trigger a change to the conclusions of the HRA.
MM91	New policy SSM1	<p>Include strategic allocation:</p> <p><u><i>Policy SSM1 - Lion Farm</i></u></p> <p>16.22 <u><i>The site is located approximately 1km southwest of Oldbury town centre and 400 metres west of Junction 2 of the M5 motorway. The site comprises 11 adult sized football pitches, which are underused, associated dilapidated changing facilities and car parking in the west, with general open space, a disused social club, areas of woodland and allotments in the north. High voltage power cables cross the site running north to southeast, with two transmission towers located within the site boundary.</i></u></p> <p>16.24 <u><i>To the east of the site is Birchley Industrial Estate, which is occupied by various large office and retail units. Beyond this is Birchley Island, a key road interchange that connects the A4034 and A4123 (Wolverhampton Road) with Junction 2 of the M5. A modern residential estate lies to the northeast of the site. The north of the site is bound by Newbury Lane, beyond which is a residential area. To the west are more residential areas, as well as Lion Farm local centre and St James Church of England Primary School. To the south are residential dwellings and the A4034 (Birchfield Lane), beyond which is Titford Canal and Pool.</i></u></p> <p>16.25 <u><i>Although the site has been developed previously, it now predominantly comprises playing pitches and has the character of a greenfield site.</i></u></p>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic allocation policy. The site allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
		<p><u>Policy SSM1 – Lion Farm</u></p> <table border="1" data-bbox="444 445 1603 731"> <tr> <td data-bbox="444 445 759 493"><u>Location</u></td><td data-bbox="759 445 1603 493"><u>Lion Farm Playing Fields, Newbury Lane, Oldbury</u></td></tr> <tr> <td data-bbox="444 493 759 541"><u>Gross Site Area (Ha)</u></td><td data-bbox="759 493 1603 541"><u>20.92</u></td></tr> <tr> <td data-bbox="444 541 759 620"><u>Indicative Net Developable Area (Ha)</u></td><td data-bbox="759 541 1603 620"><u>4.5</u></td></tr> <tr> <td data-bbox="444 620 759 731"><u>Indicative Capacity (and Completion Year)</u></td><td data-bbox="759 620 1603 731"><u>200 residential dwellings, 2.3 hectares of employment land, playing fields and associated facilities, and green space (2033-2037)</u></td></tr> </table>  <p><u>Site constraints</u></p>	<u>Location</u>	<u>Lion Farm Playing Fields, Newbury Lane, Oldbury</u>	<u>Gross Site Area (Ha)</u>	<u>20.92</u>	<u>Indicative Net Developable Area (Ha)</u>	<u>4.5</u>	<u>Indicative Capacity (and Completion Year)</u>	<u>200 residential dwellings, 2.3 hectares of employment land, playing fields and associated facilities, and green space (2033-2037)</u>		
<u>Location</u>	<u>Lion Farm Playing Fields, Newbury Lane, Oldbury</u>											
<u>Gross Site Area (Ha)</u>	<u>20.92</u>											
<u>Indicative Net Developable Area (Ha)</u>	<u>4.5</u>											
<u>Indicative Capacity (and Completion Year)</u>	<u>200 residential dwellings, 2.3 hectares of employment land, playing fields and associated facilities, and green space (2033-2037)</u>											

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<ul style="list-style-type: none"> <u>The site comprises 11 adult-size football pitches</u> <u>NGET overhead transmission lines and underground cables are present within the site (YJ ROUTE: 275Kv Overhead Transmission Line route: KITWELL - OCKER HILL 275Kv Underground Cable route: KITWELL 275KV S/S)</u> <u>A canal spur and various canal basins crossed the site historically, providing waterway access to a former brickworks and various coal shafts. Made ground, subterranean structures and untreated mine shafts may be present.</u> <u>The central part of the site is in Flood Zone 2 and Flood Zone 3, comprising approximately 9% of the total site area.</u> 		
		<p><u>Successful development of the site will require:</u></p> <ol style="list-style-type: none"> <u>that existing playing fields are not built on unless a mitigation package consistent with NPPF paragraph 103 is agreed (Policy SHW5);</u> <u>a strategy for responding to the NGET overhead transmission lines and underground cables present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage and how the impact of the assets has been reduced through good design;</u> <u>development to be located in areas of lowest flood risk (Policy SCC5);</u> <u>investigating, and where appropriate protecting important archaeological assets (Policy SHE4);</u> <u>preparation of a masterplan that identifies parts of the site for very high-density housing (Policy SHO3); and</u> <u>new employment development within Use Classes E(g)(ii), E(g)(iii), B2 or B8 (Policy SEC1).</u> 		
MM92	New paragraph 16.26	Insert introductory text for strategic mixed-use allocations in West Bromwich: <u>West Bromwich Masterplan Sites</u> <u>16.26. Four sites in the West Bromwich Masterplan have been identified to deliver mixed uses and together provide strategic benefits.</u>	Identification of strategic allocations - clarification	No – the proposed modification relates to introductory text for the mixed-use allocations. It does not trigger a change to the conclusions of the HRA.

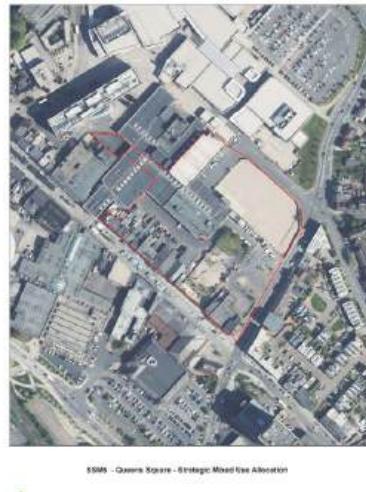
Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
MM93	New policy SSM2	<p>Include strategic allocation:</p> <p><u>Policy SSM2 - Cultural Quarter</u></p> <p>16.27. <u>The allocation is located within West Bromwich Strategic Centre approximately 150 metres northeast of Lodge Road metro station. The allocation contains several of the town's main civic buildings. The eastern corner of the site was cleared around eight years ago and there is an apartment block currently under construction on it. The southern half of the site comprises the Edward Street surface level public car park.</u></p> <p>16.28. <u>To the east of the site is a cluster of banks and the retail core of West Bromwich. To the north are other Victorian buildings, some Grade II listed, which mostly comprise offices and residential conversions. To the west are other attractive Victorian buildings including the Grade II listed Ryland Memorial School of Art, currently in use as a school, and residential buildings. To the south is a Masonic Hall and the Edward Street Hospital, which has recently undergone a partial redevelopment.</u></p> <p><u>Policy SSM2 – Cultural Quarter</u></p> <table border="1"> <tr> <td><u>Location</u></td><td><u>Cultural Quarter, High Street, West Bromwich</u></td></tr> <tr> <td><u>Gross Site Area (Ha)</u></td><td><u>1.09</u></td></tr> <tr> <td><u>Indicative Net Developable Area (Ha)</u></td><td><u>1.09</u></td></tr> <tr> <td><u>Indicative Capacity (and Completion Year)</u></td><td><u>52 residential dwellings. 1.054sqm food and beverage, 2.000sqm community/leisure and 10 car parking spaces (2025-2031)</u></td></tr> </table>	<u>Location</u>	<u>Cultural Quarter, High Street, West Bromwich</u>	<u>Gross Site Area (Ha)</u>	<u>1.09</u>	<u>Indicative Net Developable Area (Ha)</u>	<u>1.09</u>	<u>Indicative Capacity (and Completion Year)</u>	<u>52 residential dwellings. 1.054sqm food and beverage, 2.000sqm community/leisure and 10 car parking spaces (2025-2031)</u>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic allocation policy. The site allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.
<u>Location</u>	<u>Cultural Quarter, High Street, West Bromwich</u>											
<u>Gross Site Area (Ha)</u>	<u>1.09</u>											
<u>Indicative Net Developable Area (Ha)</u>	<u>1.09</u>											
<u>Indicative Capacity (and Completion Year)</u>	<u>52 residential dwellings. 1.054sqm food and beverage, 2.000sqm community/leisure and 10 car parking spaces (2025-2031)</u>											

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
				
		<p><u>Site constraints</u></p> <ul style="list-style-type: none"> • <u>Designated heritage assets present within and adjacent to the site including the West Bromwich High Street Conservation Area, Grade II Central Public Library, Grade II Town Hall, and Grade II Law Courts.</u> • <u>The site includes an existing public car park.</u> 		
	<p><u>Successful development of the site will require:</u></p> <ol style="list-style-type: none"> a) <u>the protection of the significance of heritage assets and the conservation and enhancement of local character and those aspects of heritage assets and their settings that are recognised as being of special quality (Policies SHE1 and SHE2);</u> b) <u>regenerating the Town Hall Quarter to establish a fully restored cultural and evening / night-time offer in the town centre (Policy SWB1);</u> 			

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
		<p>c) <i>delivery of a mixed-use development including new homes (Policy SWB2); and</i></p> <p>d) <i>general conformity with the Key Information set out in the West Bromwich Masterplan (Zone 3).</i></p>										
MM94	New policy SSM3	<p>Include strategic allocation:</p> <p><i>Policy SSM3 - George Street Living</i></p> <p>16.29. <i>George Street Living is located on the edge of West Bromwich Strategic Centre on a prominent site adjacent to the A4031 Trinity Way and the Birmingham to Wolverhampton metro line. The allocation currently accommodates a range of light industrial and storage uses as well as ancillary office and retail uses. The former Spring Works site was cleared around ten years ago, resulting in around two thirds of the allocation containing no buildings or fixed structures. The cleared area is currently used for open storage.</i></p> <p>16.30. <i>To the east of the allocation is the A4031 Trinity Way, a busy dual carriageway that is frequently used by HGVs; beyond is a residential area comprising mostly terraced housing. To the south is the Birmingham to Wolverhampton metro line, beyond which lie further residential properties. A large surface level car park lies to the west. Beyond this is the large Sandwell College building and industrial units on the Lyng Industrial Estate. To the north is George Street and Thomas Street, beyond which are a collection of light industrial uses, community venues and places of worship, and the rear of retail units and other main town centre uses facing the High Street.</i></p> <p><i>Policy SSM3 – George Street Living</i></p> <table border="1"> <tr> <td><i>Location</i></td><td><i>George Street Living, Trinity Way, West Bromwich</i></td></tr> <tr> <td><i>Gross Site Area (Ha)</i></td><td><i>2.36</i></td></tr> <tr> <td><i>Indicative Net Developable Area (Ha)</i></td><td><i>1.77</i></td></tr> <tr> <td><i>Indicative Capacity (and Completion Year)</i></td><td><i>327 residential units, 1,150sqm community/leisure, 79 parking spaces (2035-2040)</i></td></tr> </table>	<i>Location</i>	<i>George Street Living, Trinity Way, West Bromwich</i>	<i>Gross Site Area (Ha)</i>	<i>2.36</i>	<i>Indicative Net Developable Area (Ha)</i>	<i>1.77</i>	<i>Indicative Capacity (and Completion Year)</i>	<i>327 residential units, 1,150sqm community/leisure, 79 parking spaces (2035-2040)</i>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic allocation policy. The site allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.
<i>Location</i>	<i>George Street Living, Trinity Way, West Bromwich</i>											
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Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
				
		<p><u>Site constraints</u></p> <ul style="list-style-type: none"> <u>The site comprises light industrial and storage uses as well as ancillary office and retail uses. A former industrial site (Spring Works) has been cleared. Made ground and subterranean structures may be present.</u> <u>Safeguarding the amenity of future residents from the impacts of surrounding land uses including industrial uses to the north and the dualled A4031 Trinity Way to the east</u> 		
		<p><u>Successful development of the site will require:</u></p> <ol style="list-style-type: none"> <u>delivery of residential-led development including new homes built at very high densities (Policies SWB2 and SHO3); and</u> <u>general conformity with the Key Information set out in the West Bromwich Masterplan (Zone 5).</u> 		

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
MM95	New policy SSM4	<p>Include strategic allocation:</p> <p><u>Policy SSM4 - Queens Square</u></p> <p>16.31. <u>Queen's Square Living is located in the heart of West Bromwich Strategic Centre. The site takes in a variety of properties including some of Queens Square Shopping Centre and associated servicing area, a row of retail units fronting High Street, and the cleared sites of the former Bull Street Multi Storey Car Park and the former Marks and Spencer.</u></p> <p>16.32. <u>The southwest of the allocation is bound by the pedestrianised High Street, beyond which is the West Bromwich Central allocation which currently accommodates a variety of retail and town centre uses. To the northwest is the remainder of Queens Square Shopping Centre and other retail units fronting the High Street. To the north and northeast is the modern New Square retail / leisure development, including the access road to one of the servicing areas for New Square. To the southeast is Bull Street, beyond which are a variety of residential and main town centre uses.</u></p> <p><u>Policy SSM4 – Queens Square</u></p> <table border="1"> <tr> <td><u>Location</u></td><td><u>Queens Square Living, High Street, West Bromwich</u></td></tr> <tr> <td><u>Gross Site Area (Ha)</u></td><td><u>2.84</u></td></tr> <tr> <td><u>Indicative Net Developable Area (Ha)</u></td><td><u>2.13</u></td></tr> <tr> <td><u>Indicative Capacity (and Completion Year)</u></td><td><u>396 residential units, 7,447sqm retail, 855sqm offices, 1,395sqm community/leisure, 206 car parking spaces (2038-2041)</u></td></tr> </table>	<u>Location</u>	<u>Queens Square Living, High Street, West Bromwich</u>	<u>Gross Site Area (Ha)</u>	<u>2.84</u>	<u>Indicative Net Developable Area (Ha)</u>	<u>2.13</u>	<u>Indicative Capacity (and Completion Year)</u>	<u>396 residential units, 7,447sqm retail, 855sqm offices, 1,395sqm community/leisure, 206 car parking spaces (2038-2041)</u>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic allocation policy. The site allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.
<u>Location</u>	<u>Queens Square Living, High Street, West Bromwich</u>											
<u>Gross Site Area (Ha)</u>	<u>2.84</u>											
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Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		 <p>SSMS - Queens Square - Strategic Mixed Use Allocation</p> <p><small>© Sandwell Metropolitan Borough Council 2024 and onward</small></p> <p><u>Site constraints</u></p> <ul style="list-style-type: none"> <u>The site comprises existing retail units and other main town centre uses.</u> <p><u>Successful development of the site will require:</u></p> <ol style="list-style-type: none"> <u>delivery of mixed-use development including new homes built at very high densities (Policies SWB2 and SHO3); and</u> <u>general conformity with the Key Information set out in the West Bromwich Masterplan (Zone 2).</u> 		
MM96	New policy SSM5	<p>Include strategic allocation:</p> <p><u>Policy SSM5 - West Bromwich Central</u></p> <p>16.33. <u>West Bromwich Central is located at the gateway to West Bromwich Strategic Centre adjacent to the bus and metro stations. The site takes in a variety of town centre premises including Kings Square</u></p>	Identification of strategic	Yes – the proposed modification introduces a new strategic allocation

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
		<p><u>Shopping Centre and associated servicing yard, several retail units facing the High Street, the former Kings Cinema, the former Indoor Markets, the former Morrisons supermarket (currently occupied by JD Gyms) and a large surface level car park.</u></p> <p>16.34. <u>To the southwest of the allocation is West Bromwich Ringway, a traffic-calmed boulevard, beyond which is the large Sandwell College building and the Birmingham to Wolverhampton metro line. To the northwest is West Bromwich bus station and the continuation of retail units facing the High Street. To the northeast is the pedestrianised High Street itself, beyond which is the retail heart of the town anchored by Queens Square Shopping Centre and the modern New Square retail / leisure development. To the southeast is Bull Street, beyond which are a variety of uses including offices, retail, small storage and light industrial units, and surface level car parking.</u></p> <p><u>Policy SSM5 – West Bromwich Central</u></p> <table border="1"> <tr> <td><u>Location</u></td><td><u>West Bromwich Central, High Street, West Bromwich</u></td></tr> <tr> <td><u>Gross Site Area (Ha)</u></td><td><u>3.84</u></td></tr> <tr> <td><u>Indicative Net Developable Area (Ha)</u></td><td><u>2.85</u></td></tr> <tr> <td><u>Indicative Capacity (and Completion Year)</u></td><td><u>343 residential units, 2.302sqm retail, 5.032sqm offices, 5.060sqm education, 11,840sqm food and beverage, 9,862sqm community/leisure, 5,205sqm health and 625 parking spaces (2029-2035)</u></td></tr> </table>	<u>Location</u>	<u>West Bromwich Central, High Street, West Bromwich</u>	<u>Gross Site Area (Ha)</u>	<u>3.84</u>	<u>Indicative Net Developable Area (Ha)</u>	<u>2.85</u>	<u>Indicative Capacity (and Completion Year)</u>	<u>343 residential units, 2.302sqm retail, 5.032sqm offices, 5.060sqm education, 11,840sqm food and beverage, 9,862sqm community/leisure, 5,205sqm health and 625 parking spaces (2029-2035)</u>	allocations - clarification	policy. The site allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.
<u>Location</u>	<u>West Bromwich Central, High Street, West Bromwich</u>											
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Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		 <p>SSMS - West Bromwich Central - Strategic Mixed Use Allocation</p> <p> Sandwell Metropolitan Borough Council</p> <p>© Copyright Bentley Image Solutions Limited 2024 and revised</p>		
		<p><u>Site constraints</u></p> <ul style="list-style-type: none"> <u>The site comprises existing retail units, other main town centre uses and a privately owned publicly accessible car park.</u> 		
	<p><u>Successful development of the site will require:</u></p> <ol style="list-style-type: none"> <u>the creation of a metro gateway, a new town square and a green link through to the heart of the town centre from the metro stop (Policy SWB1);</u> <u>delivery of mixed-use development including new homes built at very high densities (Policies SWB2 and SHO3); and</u> <u>general conformity with the Key Information set out in the West Bromwich Masterplan (Zone 1).</u> 			

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
MM97	New paragraphs 16.35 – 16.36	<p>Introduce strategic employment allocation:</p> <p><i>Strategic Employment Allocations</i></p> <p><u>16.35. These are defined as vacant employment sites of over seven hectares, identified and assessed in the Black Country Economic Development Needs Assessment or Black Country Employment Area Review as important to the delivery of strategic economic growth.</u></p> <p><u>16.36. Only one site meets these criteria.</u></p>	Identification of strategic allocations - clarification	No – the proposed modification relates to introductory text for the strategic site allocations. It does not trigger a change to the conclusions of the HRA.
MM98	New policy SSE1	<p>Include strategic employment allocation:</p> <p><i>Policy SSE1 - Coneygree Business Park (open land)</i></p> <p><u>16.37. The site is a vacant site that has remained undeveloped since it formed part of the Coneygree Colliery. It is approximately 1.8km northeast of Dudley town centre, 8.2km southeast of Wolverhampton city centre and 12km northwest of Birmingham city centre.</u></p> <p><u>16.38. Access to the site is gained from Coneygree Road, Tipton, which is linked to the A4123 Birmingham New Road.</u></p> <p><u>16.39. The site is in a predominately mixed used area and was formerly known as Coneygrye Mine. The mine has not been in use since the foundry closed in the 1980s. There are no built structures present on the site, although there is an abundance of trees and vegetation and a covering of foundry sand remaining from previous operations.</u></p>	Identification of strategic allocations - clarification	Yes – the proposed modification introduces a new strategic employment allocation policy. The site allocation was assessed in the Submission HRA; however, the new policy has been assessed in the Main Modifications HRA Report.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
		<p>Policy SSE1 - Coneygree Business Park (Open Land)</p> <table border="1" data-bbox="455 445 1590 715"> <tr> <td data-bbox="455 445 736 493"><u>Location</u></td><td data-bbox="736 445 1590 493"><u>Coneygree Business Park (Open Land)</u></td></tr> <tr> <td data-bbox="455 493 736 541"><u>Gross Site Area (Ha)</u></td><td data-bbox="736 493 1590 541"><u>7.22</u></td></tr> <tr> <td data-bbox="455 541 736 620"><u>Indicative Net Developable Area (Ha)</u></td><td data-bbox="736 541 1590 620"><u>7.22</u></td></tr> <tr> <td data-bbox="455 620 736 715"><u>Indicative Capacity</u></td><td data-bbox="736 620 1590 715"><u>7.22 hectares of employment uses (E(g)(ii), E(g)(iii), B2, and B8 uses)</u></td></tr> </table>	<u>Location</u>	<u>Coneygree Business Park (Open Land)</u>	<u>Gross Site Area (Ha)</u>	<u>7.22</u>	<u>Indicative Net Developable Area (Ha)</u>	<u>7.22</u>	<u>Indicative Capacity</u>	<u>7.22 hectares of employment uses (E(g)(ii), E(g)(iii), B2, and B8 uses)</u>		
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 <p>SSE1 - Coneygree Business Park (Open Land) - Strategic Employment Allocation</p> <p>© Copyright Ordnance Survey Limited 2018 and earlier</p>												
<p><u>Site constraints</u></p> <ul style="list-style-type: none"> <u>Coal mining legacy identified at the site and several existing mineshafts spread across the site.</u> 												

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<ul style="list-style-type: none"> <u><i>It is situated in a Limestone Consideration Zone.</i></u> <u><i>The land undulates in several areas, with a differential of up to 18 metres from the highest to the lowest points.</i></u> <u><i>A culverted watercourse runs through the middle of the site from the southwest to northeast.</i></u> <u><i>Adjacent to a canal and contains four filled historical canal arms / basins in the northern section of the site.</i></u> <p><u><i>Successful development of the site will require:</i></u></p> <ol style="list-style-type: none"> <u><i>an appropriate remediation strategy to be agreed with relevant stakeholders to address contamination issues (Policy SCO3);</i></u> <u><i>investigation, and where appropriate protection of important archaeological assets (Policy SHE4);</i></u> <u><i>development to protect and enhance the character, nature conservation value, water quality, structural stability and recreational usage of the canal network (Policy SNE6); and</i></u> <u><i>assessing the feasibility of opening up and naturalising any underground culverts. Should this prove impractical, no development over culverted watercourse and allowing a suitable easement from the outside edge of the culvert (Policy SCC5).</i></u> 		
MM99	See MM74	Creation of Chapter 17 for the identification of non-strategic allocations – set out in tables below.	Clarification	No – the proposed modification introduces of a new chapter that replicates the former content of Appendix B (as detailed in MM100). It therefore does not trigger a change to the conclusions of the HRA.

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MM100	New paragraphs 17.1 – 17.3	<p>Insert new chapter:</p> <p><i>Chapter 17 – Non-Strategic Site Allocations</i></p> <p>17.1 <i>Non-strategic sites are housing, employment, mixed use and gypsy and traveller sites allocations that do not meet the threshold to be considered strategic allocations. They are distributed across the borough and provide a balanced and flexible supply of housing and employment land. These sites make an important contribution to meeting local housing and employment needs and ensuring a diversity of development opportunities throughout the plan period.</i></p> <p>17.2 <i>This approach ensures that delivery is aligned with infrastructure provision, responds to local needs, and supports the creation of sustainable, inclusive, and well-connected communities consistent with the principles of the NPPF.</i></p> <p>17.3 <i>The inclusion of a site as a non-strategic allocation does not remove the need for planning permission to be obtained.</i></p> <p>MM100 – non-strategic housing allocations</p> <table border="1"> <thead> <tr> <th><u>Site ref</u></th><th><u>Site name and address</u></th><th><u>Ward</u></th><th><u>Town</u></th><th><u>Indicative capacity</u></th><th><u>Gross site area (ha)</u></th><th><u>Indicative net developable area (ha)</u></th><th><u>Net density (dph)</u></th><th><u>Anticipated delivery timescale (completion year)</u></th><th><u>Further information</u></th></tr> </thead> <tbody> <tr> <td><u>SH 1</u></td><td><u>Brown Lion Street</u></td><td><u>Tipton Green</u></td><td><u>Tipton</u></td><td><u>28</u></td><td><u>0.46</u> <u>Brownfield</u></td><td><u>0.46</u></td><td><u>59</u></td><td><u>2026-2027</u></td><td><u>Granted consent for 27 dwellings - DC/23/67972</u></td></tr> <tr> <td><u>SH 2</u></td><td><u>Land adjacent to Asda, Wolverhampton Road, Oldbury</u></td><td><u>Langley</u></td><td><u>Oldbury</u></td><td><u>60</u></td><td><u>1.6</u> <u>Greenfield</u></td><td><u>1.6</u></td><td><u>41</u></td><td><u>2028-2029</u></td><td><u>Access issue will need to be overcome.</u> <u>Siting of houses should safeguard existing residential amenity and the asset of the watercourse.</u></td></tr> </tbody> </table>	<u>Site ref</u>	<u>Site name and address</u>	<u>Ward</u>	<u>Town</u>	<u>Indicative capacity</u>	<u>Gross site area (ha)</u>	<u>Indicative net developable area (ha)</u>	<u>Net density (dph)</u>	<u>Anticipated delivery timescale (completion year)</u>	<u>Further information</u>	<u>SH 1</u>	<u>Brown Lion Street</u>	<u>Tipton Green</u>	<u>Tipton</u>	<u>28</u>	<u>0.46</u> <u>Brownfield</u>	<u>0.46</u>	<u>59</u>	<u>2026-2027</u>	<u>Granted consent for 27 dwellings - DC/23/67972</u>	<u>SH 2</u>	<u>Land adjacent to Asda, Wolverhampton Road, Oldbury</u>	<u>Langley</u>	<u>Oldbury</u>	<u>60</u>	<u>1.6</u> <u>Greenfield</u>	<u>1.6</u>	<u>41</u>	<u>2028-2029</u>	<u>Access issue will need to be overcome.</u> <u>Siting of houses should safeguard existing residential amenity and the asset of the watercourse.</u>	Clarification and amendment following discussion at public examination	No – the proposed modification moves tables listing details for non-strategic site allocations from Appendix B into Chapter 17.
<u>Site ref</u>	<u>Site name and address</u>	<u>Ward</u>	<u>Town</u>	<u>Indicative capacity</u>	<u>Gross site area (ha)</u>	<u>Indicative net developable area (ha)</u>	<u>Net density (dph)</u>	<u>Anticipated delivery timescale (completion year)</u>	<u>Further information</u>																									
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Ref	Page / paragraph / policy reference	Proposed change										Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<u>SH 4</u>	<u>Lower High Street (Station Hotel and Dunns site).</u>	<u>Cradley Heath and Old Hill</u>	<u>Rowley Regis</u>	<u>20</u>	<u>0.28</u>	<u>Brownfield</u>	<u>0.28</u>	<u>71</u>	<u>2032-2033</u>	<u>N/A</u>	
		<u>SH 5</u>	<u>Mill Street, Great Bridge</u>	<u>Great Bridge</u>	<u>Tipton</u>	<u>40</u>	<u>0.86</u>	<u>Brownfield</u>	<u>0.86</u>	<u>45</u>	<u>2028-2029</u>	<u>Applications on part of site.</u> <u>DC/22/67019 -Land at Mill Street Tipton Proposed 20 no. dwellings with associated parking.</u> <u>DC/22/67018 - 8 homes pending consent.</u> <u>Within Wednesbury Regeneration Area</u>	
		<u>SH 6</u>	<u>Swan Lane, north of A41 West Bromwich</u>	<u>Greets Green and Lyng</u>	<u>West Bromwich</u>	<u>147</u>	<u>3.78</u>	<u>Brownfield</u>	<u>2.42</u>	<u>61</u>	<u>2026-2029</u>	<u>Application - DC/22/66532: Proposed 147 dwelling houses (65 houses and 82 apartments)</u>	
		<u>SH 7</u>	<u>The Boat Gauging House and adjoining land. Factory Road, Tipton</u>	<u>Tipton Green</u>	<u>Tipton</u>	<u>50</u>	<u>0.57</u>	<u>Brownfield</u>	<u>0.57</u>	<u>88</u>	<u>2028-2030</u>	<u>Application - DC/21/65872 - Proposed residential development comprising of 46 no. 1 and 2 bed apartments, and conversion of boat house to 4 no. 2 bed residential units.</u>	

Ref	Page / paragraph / policy reference	Proposed change									Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
											<i><u>Within Tipton and Dudley Port Regeneration Area.</u></i> <i><u>Development proposals should have regard to the heritage assets on site in scale, form and impact on character.</u></i>	
	<i><u>SH 8</u></i>	<i><u>Alma Street, Wednesbury</u></i>	<i><u>Friar Park</u></i>	<i><u>Wednesbury</u></i>	<i><u>23</u></i>	<i><u>0.52</u></i>	<i><u>Brownfield</u></i>	<i><u>0.52</u></i>	<i><u>44</u></i>	<i><u>2030-2031</u></i>	<i><u>N/A</u></i>	
	<i><u>SH 9</u></i>	<i><u>The Phoenix Collegiate, Friar Park Road, Wednesbury</u></i>	<i><u>West Bromwich Central</u></i>	<i><u>West Bromwich</u></i>	<i><u>105</u></i>	<i><u>4.80</u></i>	<i><u>Brownfield</u></i>	<i><u>2.35</u></i>	<i><u>30</u></i>	<i><u>2026-2028</u></i>	<i><u>Application - DC/20/63911: Proposed residential development of up to 84 No. dwellings, associated public open space and infrastructure (outline application for access). Playing field loss mitigation may be required as per SHW5</u></i>	
	<i><u>SH 10</u></i>	<i><u>Tipton Conservative and Unionist Club, 64 Union Street, Tipton</u></i>	<i><u>Tipton Green</u></i>	<i><u>Tipton</u></i>	<i><u>15</u></i>	<i><u>0.19</u></i>	<i><u>Brownfield</u></i>	<i><u>0.19</u></i>	<i><u>74</u></i>	<i><u>2029-2030</u></i>	<i><u>Application - DC/19/62733: Proposed change of use to residential, to include 7 No. 1 bed properties and 7 No. 2 bed properties. Application has now expired.</u></i>	

Ref	Page / paragraph / policy reference	Proposed change									Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
										<i>Within Tipton and Dudley Port Regeneration Area</i>		
	<i>SH 11</i>	<i>Sandwell District and General Hospital, West Bromwich</i>	<i>West Bromwich Central</i>	<i>West Bromwich</i>	<i>121</i>	<i>0.82</i>	<i>Brownfield</i>	<i>0.82</i>	<i>148</i>	<i>2030-2032</i>	<i>Application - DC/20/64894; Demolition of existing building and proposed mixed use development comprising of 12 No. houses and 109 No. apartments for key workers. Application has now expired.</i>	
	<i>SH 13</i>	<i>Silverthorne Lane / Forge Lane, Cradley Heath</i>	<i>Cradley Heath and Old Hill</i>	<i>Rowley Regis</i>	<i>81</i>	<i>2.41</i>	<i>Brownfield</i>	<i>1.81</i>	<i>45</i>	<i>2035-2038</i>	<i>N/A</i>	
	<i>SH 14</i>	<i>Langley Maltings, Western Road, Langley</i>	<i>Oldbury</i>	<i>Oldbury</i>	<i>71</i>	<i>2.72</i>	<i>Brownfield</i>	<i>2.04</i>	<i>35</i>	<i>2040-2041</i>	<i>Density reflects that this the site contains a Grade II listed building. Development proposals should have full regard to adjacent heritage assets in scheme layout, design and appearance</i>	
	<i>SH 15</i>	<i>Macarthur Road Industrial Estate, Cradley Heath</i>	<i>Cradley Heath and Old Hill</i>	<i>Rowley Regis</i>	<i>13</i>	<i>0.3</i>	<i>Brownfield</i>	<i>0.3</i>	<i>43</i>	<i>2035-2036</i>	<i>N/A</i>	

Ref	Page / paragraph / policy reference	Proposed change										Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<u>SH 16</u>	<u>Cradley Heath Factory Centre, Woods Lane, Cradley</u>	<u>Cradley Heath and Old Hill</u>	<u>Rowley Regis</u>	<u>170</u>	<u>4.85</u>	<u>Brownfield</u>	<u>3.64</u>	<u>45</u>	<u>2030-2035</u>	<u>Part of site has application - DC/21/66444: Proposed demolition of existing industrial buildings and development of 34 No. dwellings. Part of the site with planning permission is developed.</u>	
		<u>SH 17</u>	<u>Land adjacent Droicon Estate, Portway Road, Rowley Regis</u>	<u>Rowley</u>	<u>Rowley Regis</u>	<u>28</u>	<u>0.7</u>	<u>Brownfield</u>	<u>0.7</u>	<u>40</u>	<u>2030-2031</u>	<u>N/A</u>	
		<u>SH 19</u>	<u>Land at Horseley Heath, Alexandra Road and Lower Church Lane, Tipton</u>	<u>Great Bridge</u>	<u>Tipton</u>	<u>77</u>	<u>2.26</u>	<u>Brownfield</u>	<u>1.7</u>	<u>40</u>	<u>2040-2041</u>	<u>SLINC SA028 – Alexandra Road to the north of the site. SLINC SA103.1 Dixons Branch Canal to the south of the site Development proposals where adjacent to the canal should have full regard to the nature conservation needs of the SLINC</u>	
		<u>SH 20</u>	<u>Elbow Street, Old Hill</u>	<u>Cradley Heath and Old Hill</u>	<u>Rowley Regis</u>	<u>33</u>	<u>0.77</u>	<u>Brownfield</u>	<u>0.77</u>	<u>43</u>	<u>2032-2033</u>	<u>N/A</u>	

Ref	Page / paragraph / policy reference	Proposed change										Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<u>SH 21</u>	<u>Dudley Road East</u>	<u>Oldbury</u>	<u>Oldbury</u>	<u>90</u>	<u>2.65</u>	<u>Brownfield</u>	<u>2.00</u>	<u>45</u>	<u>2035-2038</u>	<u>Adjacent to a SINC SA038 – Gower Branch Canal.</u> <u>Within Tipton and Dudley Port Regeneration Area.</u> <u>Development proposals where adjacent to the canal should have full regard to the nature conservation needs of the adjacent SINC.</u>	
		<u>SH 22</u>	<u>Tatbank Road, Oldbury</u>	<u>St Pauls</u>	<u>Smethwick</u>	<u>52</u>	<u>1.15</u>	<u>Brownfield</u>	<u>1.15</u>	<u>45</u>	<u>2040-2041</u>	<u>N/A</u>	
		<u>SH 23</u>	<u>28-64 High Street, West Bromwich</u>	<u>West Bromwich Central</u>	<u>West Bromwich</u>	<u>53</u>	<u>0.60</u>	<u>Brownfield</u>	<u>0.60</u>	<u>88</u>	<u>2031-2033</u>	<u>N/A</u>	
		<u>SH 24</u>	<u>Cokeland Place/ Graingers Lane, Cradley Heath</u>	<u>Cradley Heath and Old Hill</u>	<u>Rowley Regis</u>	<u>16</u>	<u>0.36</u>	<u>Brownfield</u>	<u>0.36</u>	<u>44</u>	<u>2035-2036</u>	<u>N/A</u>	
		<u>SH 25</u>	<u>Bradleys Lane/ High Street, Tipton</u>	<u>Prince's End</u>	<u>Tipton</u>	<u>189</u>	<u>5.60</u>	<u>Brownfield</u>	<u>4.20</u>	<u>45</u>	<u>2038-2041</u>	<u>An appropriate remediation strategy to be agreed and implemented with relevant stakeholders to address contamination issues (Policy SCO3)</u>	

Ref	Page / paragraph / policy reference	Proposed change										Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
												<i><u>Adjacent to Brierley Lane Open Space, which is also a SLINC SA011- Dudley to Priestfield Disused Railway. Appropriate mitigation will be required.</u></i>	
	<i><u>SH 26</u></i>	<i><u>Lower City Road, Oldbury</u></i>	<i><u>Oldbury</u></i>	<i><u>Oldbur</u></i> y	<i><u>73</u></i>	<i><u>1.83</u></i>	<i><u>1.83</u></i>	<i><u>40</u></i>	<i><u>2035-2038</u></i>			<i><u>An appropriate remediation strategy to be agreed and implemented with relevant stakeholders to address contamination issues (Policy SCO3) Development proposals should have full regard for the canal side location. Within Tipton and Dudley Port Regeneration Area.</u></i>	
	<i><u>SH 27</u></i>	<i><u>Site surrounding former Post office and Telephone Exchange, Horseley Heath</u></i>	<i><u>Great Bridge</u></i>	<i><u>Tipton</u></i>	<i><u>52</u></i>	<i><u>1.16</u></i> <i><u>Brownfield</u></i>	<i><u>1.16</u></i>	<i><u>45</u></i>	<i><u>2034-2036</u></i>			<i><u>N/A</u></i>	

Ref	Page / paragraph / policy reference	Proposed change										Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<u>SH 28</u>	<u>Friar Street, Wednesbury</u>	<u>Friar Park</u>	<u>Wednesbury</u>	<u>45</u>	<u>1.01 Brownfield</u>	<u>1.01</u>	<u>45</u>	<u>2040-2041</u>	<u>Adjacent to SLINC SA002 Woden Road South.</u> <u>Development proposals should have full regard to the nature conservation needs of the adjacent SINC.</u>		
		<u>SH 29</u>	<u>Used car sales site, corner of Lower Church Lane and Horseley Heath, Tipton</u>	<u>Tipton Green</u>	<u>Tipton</u>	<u>23</u>	<u>0.56 Brownfield</u>	<u>0.56</u>	<u>41</u>	<u>2040-2041</u>	<u>N/A</u>		
		<u>SH 30</u>	<u>Land to east of Black Lake, West Bromwich</u>	<u>Hateley Heath</u>	<u>West Bromwich</u>	<u>83</u>	<u>2.45 Brownfield</u>	<u>1.83</u>	<u>45</u>	<u>2040-2041</u>	<u>Site adjacent to SINC SA034 Ridgeacre Branch Canal.</u> <u>Development proposals where adjacent to the canal should have full regard to the nature conservation needs of the adjacent SINC.</u>		
		<u>SH 31</u>	<u>Summerton Road, Oldbury</u>	<u>Oldbury</u>	<u>Oldbury</u>	<u>36</u>	<u>0.89 Brownfield</u>	<u>0.89</u>	<u>40</u>	<u>2035-2037</u>	<u>Development proposals should have full regard for the canal side location.</u>		

Ref	Page / paragraph / policy reference	Proposed change										Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<u>SH 32</u>	<u>Bank Street (West), Hateley Heath</u>	<u>Hateley Heath</u>	<u>West Bromwich</u>	<u>43</u>	<u>0.85</u>	<u>Brownfield</u>	<u>0.85</u>	<u>51</u>	<u>2030-2032</u>	<u>N/A</u>	
		<u>SH 33</u>	<u>Wellington Road, Tipton</u>	<u>Tipton Green</u>	<u>Tipton</u>	<u>40</u>	<u>0.91</u>	<u>Brownfield</u>	<u>0.91</u>	<u>44</u>	<u>2040-2041</u>	<u>Within Tipton and Dudley Port Regeneration Area</u>	
		<u>SH 34</u>	<u>Brandhall Golf Course</u>	<u>Old Warley</u>	<u>Oldbury</u>	<u>190</u>	<u>5.18</u>	<u>Greenfield</u>	<u>3.88</u>	<u>48</u>	<u>2026-2031</u>	<u>Application - DC/23/68540: Proposed demolition of existing buildings and erection of 1 No. primary school, 190 No. dwellings, public open space, landscaping and associated works (outline application with all matters reserved)</u> <u>Golf course loss mitigation as per SHW5</u>	
		<u>SH 38</u>	<u>Brades Road, Oldbury</u>	<u>Oldbury</u>	<u>Oldbury</u>	<u>51</u>	<u>1.16</u>	<u>Brownfield</u>	<u>1.16</u>	<u>45</u>	<u>2030-31</u>	<u>Gas pipeline possibly running along line of canal could constrain the site and reduce development capacity. Appropriate mitigation should be considered.</u>	
		<u>SH 40</u>	<u>Langley Swimming Centre</u>	<u>Langley</u>	<u>Oldbury</u>	<u>20</u>	<u>0.49</u>	<u>Brownfield</u>	<u>0.49</u>	<u>41</u>	<u>2026-2027</u>	<u>N/A</u>	

Ref	Page / paragraph / policy reference	Proposed change									Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
			<u>Vicarage Road, Oldbury</u>									
	<u>SH 42</u>	<u>Forge Tavern, Franchise Street, Wednesbury</u>	<u>Wednesbury North</u>	<u>Wednesbury</u>	<u>10</u>	<u>0.14</u> <u>Brownfield</u>	<u>0.14</u>	<u>71</u>	<u>2031-2032</u>	<u>N/A</u>		
	<u>SH 43</u>	<u>Land off Tanhouse Avenue, Great Barr</u>	<u>Newton</u>	<u>West Bromwich</u>	<u>46</u>	<u>1.66</u> <u>Greenfield</u>	<u>1.15</u>	<u>40</u>	<u>2040-2041</u>	<u>SLINC SA045:20 Tanhouse Avenue will need to be mitigated. Adjacent to SINC SA045 Forge Mill.</u> <u>Any proposal will need to allow for access to the adjacent playing field.</u> <u>Playing field loss mitigation may be required as per SHW5</u>		
	<u>SH 44</u>	<u>Wyndmill Crescent, West Bromwich</u>	<u>Charlemon</u>	<u>West Bromwich</u>	<u>11</u>	<u>0.19</u> <u>Brownfield</u>	<u>0.19</u>	<u>58</u>	<u>2033-2034</u>	<u>N/A</u>		
	<u>SH 45</u>	<u>Site of 30-144 Mounts Road, Wednesbury</u>	<u>Wednesbury South</u>	<u>Wednesbury</u>	<u>45</u>	<u>1.07</u> <u>Brownfield</u>	<u>1.07</u>	<u>42</u>	<u>2025-2026</u>	<u>DC/22/67797 - Proposed residential development comprising of 45 dwellings, landscaping and car parking. Site under construction</u>		

Ref	Page / paragraph / policy reference	Proposed change										Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<u>SH 47</u>	<u>Site of former Stone Cross Neighbourhood Office</u>	<u>Charlemo nt with Grove Vale</u>	<u>West Bromw ich</u>	<u>14</u>	<u>0.32</u>	<u>Brownfield</u>	<u>0.32</u>	<u>47</u>	<u>2029-2030</u>	<u>Application DC/18/61923 – Proposed erection of dwellings. New planning application submitted DC/23/6896</u>	
		<u>SH 49</u>	<u>Johns Street, Carters Green</u>	<u>West Bromw ich Central</u>	<u>West Bromw ich</u>	<u>33</u>	<u>0.82</u>	<u>Brownfield</u>	<u>0.82</u>	<u>40</u>	<u>2032-2033</u>	<u>Within Carters Green Regeneration Area</u>	
		<u>SH 50</u>	<u>Tentec, Guns Lane</u>	<u>West Bromw ich Central</u>	<u>West Bromw ich</u>	<u>129</u>	<u>0.6</u>	<u>Brownfield</u>	<u>0.6</u>	<u>210</u>	<u>2030-2033</u>	<u>Application DC/22/67454 – Proposed new build development of 129 apartments with amenities, 69 onsite parking spaces and associated landscaping – pending decision.</u> <u>Within Carters Green Regeneration Area</u>	
		<u>SH 51</u>	<u>Providence Place / Bratt Street, West Bromwich</u>	<u>West Bromw ich Central</u>	<u>West Bromw ich</u>	<u>40</u>	<u>0.74</u>	<u>Brownfield</u>	<u>0.74</u>	<u>100</u>	<u>2037-2038</u>	<u>Part of West Bromwich Masterplan</u> <u>Within West Bromwich Regeneration Area</u> <u>Applicants will need to assess impact on heritage including the Grade II Listed Highfields buildings and demonstrate</u>	

Ref	Page / paragraph / policy reference	Proposed change									Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
											<u>acceptability of the proposal.</u>	
	<u>SH 52</u>	<u>Overend Street, West Bromwich</u>	<u>West Bromwich Central</u>	<u>West Bromwich</u>	<u>70</u>	<u>0.71</u>	<u>Brownfield</u>	<u>0.71</u>	<u>99</u>	<u>2039-2041</u>	<u>Remaining element of Eastern Gateway.</u> <u>Within West Bromwich Regeneration Area.</u>	
	<u>SH 59</u>	<u>Beever Road</u>	<u>Great Bridge</u>	<u>Tipton</u>	<u>18</u>	<u>0.83</u>	<u>Brownfield</u>	<u>0.83</u>	<u>22</u>	<u>2025-2026</u>	<u>Application - DC/21/65582: Proposed 10 No. bungalows and 8 No. flats. Site under construction in 2024</u>	
	<u>SH 61</u>	<u>Thandi Coach Station, Alma Street, West Bromwich</u>	<u>Soho and Victoria</u>	<u>Smethwick</u>	<u>58</u>	<u>0.71</u>	<u>Brownfield</u>	<u>0.71</u>	<u>82</u>	<u>2029-2030</u>	<u>Application - DC/17/60747: Proposed residential development of 54 No apartments and 4 No. houses - made a start on site.</u> <u>Within Smethwick Regeneration Area</u>	
	<u>SH 62</u>	<u>Star and Garter, 252 Duchess Parade, West Bromwich</u>	<u>West Bromwich Central</u>	<u>West Bromwich</u>	<u>60</u>	<u>0.05</u>	<u>Brownfield</u>	<u>0.05</u>	<u>200</u>	<u>2031-2032</u>	<u>Application - DC/21/65798: Proposed nine storey mixed use development comprising of 1 No. retail unit at ground floor and 60 No. apartments above.</u> <u>Within West Bromwich Regeneration Area</u>	

Ref	Page / paragraph / policy reference	Proposed change										Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<u>SH 63</u>	<u>192 – 200 Dudley Road, Oldbury, B69 3DS</u>	<u>Oldbury</u>	<u>Oldbury</u>	<u>24</u>	<u>0.58</u>	<u>Brownfield</u>	<u>0.58</u>	<u>41</u>	<u>2031-2032</u>	<u>N/A</u>	
		<u>SH 64</u>	<u>Windmill House, Windmill Lane, Smethwick</u>	<u>Soho and Victoria</u>	<u>Smethwick</u>	<u>10</u>	<u>0.21</u>	<u>Brownfield</u>	<u>0.21</u>	<u>47</u>	<u>2030-2031</u>	<u>N/A</u>	
		<u>SH 65</u>	<u>Smethwick Police Station, Piddock Road, Smethwick B66 3BL</u>	<u>Soho and Victoria</u>	<u>Smethwick</u>	<u>10</u>	<u>0.22</u>	<u>Brownfield</u>	<u>0.22</u>	<u>45</u>	<u>2030-2031</u>	<u>The site is entirely within the Smethwick High Street and Crocketts Lane Conservation Area and is home to Locally Listed buildings that stand within the setting of heritage assets including a statutory Listed Building. Proposals will be required to demonstrate acceptability in terms of material planning considerations including impacts on heritage.</u>	
		<u>SH 66</u>	<u>Wednesbury Police Station, Albert Street, Wednesbury</u>	<u>Wednesbury South</u>	<u>Wednesbury</u>	<u>15</u>	<u>0.33</u>	<u>Brownfield</u>	<u>0.33</u>	<u>45</u>	<u>2030-2031</u>	<u>Proposals will need to take account of impact upon the setting of the nearby listed Richards Art Gallery and adjacent locally listed buildings.</u>	

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											<p><i>Heritage is a component of the Council's strategic vision for Wednesbury as set out the in Wednesbury Town Centre Masterplan.</i></p>		
	<i>SH 67</i>	<i>Land at Tippity Green (golf course)</i>	<i>Rowley Regis</i>	<i>Rowley Regis</i>	<i>250</i>	<i>10.30 Greenfield and brownfield</i>	<i>6.25</i>	<i>40</i>	<i>2028-2031</i>				

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<table border="1"> <thead> <tr> <th>Site Ref</th><th>Site Name and Address</th><th>Ward</th><th>Town</th><th>Appropriate Uses and Capacities</th><th>Gross Site Area (Ha)</th><th>Anticipated delivery Timescale (Completion Year)</th><th>Further Information</th><th></th><th></th><th></th></tr> </thead> <tbody> <tr> <td>SM1</td><td><u>Chances Glass Works, land west of Spon Lane, north of Palace Drive</u></td><td><u>St Pauls</u></td><td><u>West Bromwich</u></td><td><u>Housing – 276 units</u> <u>Workspace – 7,208m²</u> <u>Heritage centre – 779m²</u> <u>Open space – 1ha</u> <u>New highways access onto Spon Lane</u></td><td><u>0.64</u> <u>Brownfield</u></td><td><u>2040-2041</u></td><td><u><i>Heritage-led regeneration appropriate programme given the identified heritage assets within the sites (Grade II Listed Building, Scheduled Ancient Monument, Galton Valley Conservation Area).</i></u> <u><i>The site is a key industrial heritage site. Consequently, proposals for regeneration should have particular regard to the heritage assets in all respects.</i></u></td><td></td><td></td><td></td></tr> <tr> <td>SM3</td><td><u>Evans Halshaw car showroom, Carters Green</u></td><td><u>West Bromwich Central</u></td><td><u>West Bromwich</u></td><td><u>Housing – 140 units</u> <u>Ancillary commercial – 7 units (approx. 2,000m² total)</u></td><td><u>0.89</u> <u>Brownfield</u></td><td><u>2030-2033</u></td><td><u><i>Within West Bromwich Regeneration Area</i></u> <u><i>Given its prominent location, there is potential for impact on the street scene. This, together with impacts on nearby heritage assets, will be material</i></u></td><td></td><td></td><td></td></tr> </tbody> </table>											Site Ref	Site Name and Address	Ward	Town	Appropriate Uses and Capacities	Gross Site Area (Ha)	Anticipated delivery Timescale (Completion Year)	Further Information				SM1	<u>Chances Glass Works, land west of Spon Lane, north of Palace Drive</u>	<u>St Pauls</u>	<u>West Bromwich</u>	<u>Housing – 276 units</u> <u>Workspace – 7,208m²</u> <u>Heritage centre – 779m²</u> <u>Open space – 1ha</u> <u>New highways access onto Spon Lane</u>	<u>0.64</u> <u>Brownfield</u>	<u>2040-2041</u>	<u><i>Heritage-led regeneration appropriate programme given the identified heritage assets within the sites (Grade II Listed Building, Scheduled Ancient Monument, Galton Valley Conservation Area).</i></u> <u><i>The site is a key industrial heritage site. Consequently, proposals for regeneration should have particular regard to the heritage assets in all respects.</i></u>				SM3	<u>Evans Halshaw car showroom, Carters Green</u>	<u>West Bromwich Central</u>	<u>West Bromwich</u>	<u>Housing – 140 units</u> <u>Ancillary commercial – 7 units (approx. 2,000m² total)</u>	<u>0.89</u> <u>Brownfield</u>	<u>2030-2033</u>	<u><i>Within West Bromwich Regeneration Area</i></u> <u><i>Given its prominent location, there is potential for impact on the street scene. This, together with impacts on nearby heritage assets, will be material</i></u>			
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	<u>SM4</u>	<u>Army Reserve, Carters Green</u>	<u>West Bromwich Central</u>	<u>West Bromwich</u>	<u>Housing – 63 units</u> <u>Ancillary commercial – 4 units</u> <u>(approx. 1,000m² total)</u>	<u>1.17</u> <u>Brownfield</u>	<u>2035-2037</u>	<u>Within West Bromwich Regeneration Area</u> <u>Given its prominent location, there is potential for impact on the street scene. This, together with impacts on nearby heritage assets, will be material in determination of any application.</u>																																
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							<i><u>NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design</u></i>		
	<u>SEC1-6</u>	<u>Brandon Way / Albion Road</u>	<u>Greets Green and Lyng</u>	<u>West Bromwich</u>	<u>1.54</u>	<u>N/A</u>			
	<u>SEC1-7</u>	<u>Legacy 43, Ryder Street, West Bromwich</u>	<u>Great Bridge</u>	<u>West Bromwich</u>	<u>0.88</u>	<u>N/A</u>			
	<u>SEC1-8</u>	<u>Roway Lane, Oldbury</u>	<u>Oldbury</u>	<u>Oldbury</u>	<u>3.65</u>		<i><u>The development will be developed with the following site-specific criteria:</u></i> <i><u>VT ROUTE TWR (019 - 036): 400Kv Overhead Transmission Line route: KITWELL - OCKER HILL - A strategy for responding to the NGET overhead transmission lines present within the site that demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage and how the impact of the assets has been reduced through good design.</u></i>		
	MM100– Gypsy and Traveller site allocations								
<u>Site Ref</u>	<u>Site Name and Address</u>	<u>Ward</u>	<u>Town</u>	<u>Gross Site Area (Ha)</u>	<u>Indicative Net Developable Area (Ha)</u>	<u>Indicative Capacity</u>	<u>Anticipated delivery Timescale (Completion Year)</u>	<u>Further Information</u>	
<u>SG1</u>	<u>Brierley Lane</u>	<u>Princess End</u>	<u>Tipton</u>	<u>0.73</u>	<u>0.73</u>	<u>10 pitches</u>	<u>2030-2031</u>	<u>Extension to caravan site – funding required</u>	

Ref	Page / paragraph / policy reference	Proposed change									Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<u>SG2</u>	<u>Brierley Lane</u>	<u>Princess End</u>	<u>Tipton n</u>	<u>0.75</u>	<u>0.73</u>	<u>16 pitches</u>	<u>N/A</u>	<u>Allocation to safeguard existing use as gypsy and traveller site</u>		
MM101	Chapter 16	Renumber chapter to account for insertion of new chapters before it. Make consequential changes accordingly: <i>16-18. Delivery, Monitoring, and Implementation</i>									Update	No – the proposed modification relates to editorial changes to chapter numbering. It therefore does not trigger a change to the conclusions of the HRA.
	Paragraph 16.2	Amend and reorder text: <i>16.2 Monitoring indicators for each chapter of the Plan are set out below. Performance against the indicators will provide the Council and interested stakeholders with important data about development and land-use change within Sandwell. It will show whether the policies are performing effectively and if the Council should commence an early review of the Plan.</i> <i>16.3 Performance against the indicators will also provide the Council and interested stakeholders with important data about development and land-use change within Sandwell.</i> <i>16.3 Notwithstanding this, the Council is required under the transitional arrangements set out in paragraph 236 of the 2024 version of the NPPF to begin work on a new local plan under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023, as soon as the relevant provisions are brought into force. The preparation of the new plan will run concurrently with the preparation of a Spatial Development Strategy, which is expected to include the authorities that are constituent members of the West Midlands Combined Authority, including Sandwell.</i>									Clarification of timetable for review and forthcoming SDS	No – the proposed modification provides clarification regarding delivery, monitoring and implementation of the Plan and future iterations, in the context of national planning policy. It therefore does not trigger a change to the conclusions of the HRA.
MM102	Figures 6, 8, 12 and 13	In the key for Bearwood, Cape Hill, Wednesbury and West Bromwich Town Centre Maps Delete <u>Retail Core</u> and replace with <u>Primary Shopping Area</u>									Update and consistency	No – the proposed modification updates a figure label in the Plan to provide clarity. It therefore does not trigger a change to

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the MM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
				the conclusions of the HRA.
MM103	Figure 14	Figure 14 Existing Transport Network <u>Add canal network to map</u>	Canal network added	No – the proposed modification updates a figure in the Plan to provide up-to-date visual context. It therefore does not trigger a change to the conclusions of the HRA.
MM104	Figure 15	Figure 15 Transport Improvement Plan <u>Update Key Route Network</u>	Update and consistency	No – the proposed modification updates a figure in the Plan to provide up-to-date visual context. It therefore does not trigger a change to the conclusions of the HRA.
MM105	Figure 16	Figure 16 Core Bus Plan <u>Update Core Bus Network</u>	Update and consistency	No – the proposed modification updates a figure in the Plan to provide up-to-date visual context. It therefore does not trigger a change to the conclusions of the HRA.

A.3 Additional Modifications

A.1.1.5 A number of Additional Modifications have been proposed by SMBC. These Additional Modifications relate to inconsequential changes such as formatting, grammar and accessibility corrections, as well as contextual information and updated baseline information reflecting changes that have occurred since the Submission version of the SLP was prepared, and to take account of other proposed Main Modifications and resultant editorial changes. These changes will not affect any of the HRA information.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
	General	<p>Make amendments / corrections and any related consequential changes throughout the Sandwell Local Plan (SLP) as related to the identification of main and additional modifications.</p> <p>This may include similar minor changes and updates to the text of the Sustainability Appraisal, HRA and technical / supporting documents and information.</p> <p><i>De minimis</i> changes that <u>do not</u> affect the interpretation or potential use of the policy may include:</p> <ul style="list-style-type: none">• minor factual or numeric updates or clarifications• the correction of typographical or grammatical errors• consequential renumbering of paragraphs, table and figure reference numbers• amendments to the text where it references the process of producing / consulting on the SLP• changes to text that refers to the plan's draft status or its production in the future tense <p>and will be made where they arise. These <i>de minimis</i> corrections will not be recorded in the two schedules of modifications but will appear in the illustrative track change version of the SLP and its appendices</p>	Corrections, updates and <i>de minimis</i> changes	No – the proposed modification relates to minor wording changes throughout the SLP. It therefore does not trigger a change to the conclusions of the HRA.
AM1	various	Update housing, employment and other relevant figures throughout the SLP where these non-policy related changes relate to <i>de minimis</i> and consequential revisions / corrections etc.	Update and corrections	No – the proposed modification relates to <i>de minimis</i> factual and wording corrections only. It therefore does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
AM2	Paragraph 2	<p>Amend details of plan structure:</p> <ul style="list-style-type: none"> • <u>Chapters 4 - 15 set out the detailed policies, organised by themes and reflecting the role of the Vision in delivering sustainable growth for Sandwell.</u> • <u>Chapter 16 identifies strategic site allocations for housing, mixed use and employment in the borough.</u> • <u>Chapter 17 identifies non-strategic allocations for housing, employment, mixed use and gypsy and traveller sites.</u> • <u>Chapter 18 sets out monitoring targets.</u> 	Consequential update following main modifications	No – the proposed modification is an editorial update to chapter titles / numbering. It therefore does not trigger a change to the conclusions of the HRA.
AM3	Paragraph 3	<p>Consequential amendment following creation of Chapters 16 and 17:</p> <p><i>3. In addition to this, the Plan contains appendices that address in more detail certain aspects of the policies and contain further information on them, and a glossary of terms used in the plan allocated sites for both housing and employment uses. Alongside ...</i></p>	Update and clarification	No – the proposed modification relates to minor wording changes. It therefore does not trigger a change to the conclusions of the HRA.
AM4	Paragraph 29	<p>Amend text:</p> <p><i>There have also been several changes to national policy, including a revised revisions to the National Planning Policy Framework in December 2023 and associated guidance ...</i></p>	Amendment to reflect changes in guidance	No – the proposed modification relates to minor wording change. It therefore does not trigger a change to the conclusions of the HRA.
AM5	Paragraph 37	<p>Correction:</p> <p><i>Several ironworks were established here, including the Soho Manufactory Foundry (1761-1795-8) at Smethwick, which was associated with the engineers James Watt and Matthew Boulton.</i></p>	Factual correction	No – the proposed modification relates to minor wording. It therefore does not trigger a change to the

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?																		
				conclusions of the HRA.																		
AM6	Paragraphs 47 - 48	<p>Amend figures:</p> <p>47. Crime in Sandwell - In the twelve months to the end of 2024 Q2 2023-Q3, Sandwell recorded 102.17 109.01 crimes per 1000 people. This represented a decrease from 110.63 115.13 crimes per 1000 people during the previous equivalent Q2 Q3 period. The number of recorded offences (excluding fraud) in Sandwell for the past 12 months was 35,511 37,524 crimes.</p> <p>48. Sandwell therefore currently ranks at 21 18 out of 36 in all English metropolitan boroughs for crime. Trafford Wirral had the lowest number of offences – 71.79 85.85 crimes per 1000 people in this quarter - with Manchester having the largest number at 158.71 174.69 crimes per 1000 people offences¹¹.</p> <p>¹¹ Information taken from LG Inform</p>	<p>Factual update – in line with changes to PCC minor modifications to update figures to 2024</p>	<p>No – the proposed modification updates crime statistics in the introductory text. It therefore does not trigger a change to the conclusions of the HRA.</p>																		
AM7	Paragraphs 49 - 50	<p>Amend figures and dates:</p> <p>49. West Midlands Police (WMP) have also identified an indicative level of crime in Sandwell, taken from the ONS and their own crime figures (offences / incidents / calls) for 2022-2023:</p> <table border="1"> <thead> <tr> <th></th> <th>Households</th> <th>Calls for Service</th> <th>Offences</th> <th>Calls for service per household</th> <th>Offences per household</th> </tr> </thead> <tbody> <tr> <td>West Midlands</td> <td>1,163,039 1,170,711</td> <td>635,972 770,335</td> <td>364,950 340,094</td> <td>0.55 0.66</td> <td>0.31 0.29</td> </tr> <tr> <td>Sandwell</td> <td>129,512 130,399</td> <td>70,832 87,775</td> <td>38,503 37,469</td> <td>0.55 0.67</td> <td>0.30 0.29</td> </tr> </tbody> </table> <p>50. According to WMP, the proposed numbers of new homes (based on the figure of 10,434, set out in the Regulation 19 Consultation version of the plan 11,167 supply against a need of 29,50011) would represent an 8.5% increase in the number of households within Sandwell. If the same percentage increase is applied to the actual incident and crime statistics for the area, the predicted proportional additional and</p>		Households	Calls for Service	Offences	Calls for service per household	Offences per household	West Midlands	1,163,039 1,170,711	635,972 770,335	364,950 340,094	0.55 0.66	0.31 0.29	Sandwell	129,512 130,399	70,832 87,775	38,503 37,469	0.55 0.67	0.30 0.29	<p>Factual update – based on the extant figure of 10,434 houses proposed in the Submission Version.</p>	<p>No – the proposed modification updates crime statistics in the introductory text. It therefore does not trigger a change to the conclusions of the HRA.</p>
	Households	Calls for Service	Offences	Calls for service per household	Offences per household																	
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		<i>total incidents / crimes likely to occur within a calendar year is likely to be in the order of <u>7,000</u> 6,016 additional calls for service and <u>3,000</u> 3,270 additional offences.</i>		
AM8	Paragraph 89f	Reference emergency services and utility companies: <i>... New housing and economic development will put pressure on existing services (<u>including emergency services</u>), <u>and utilities and utility companies</u> but may also create opportunities to deliver infrastructure-based solutions.</i>	EiP discussion	No – the proposed modification relates to minor wording changes. It therefore does not trigger a change to the conclusions of the HRA.
AM9	Paragraph 90 Challenges and Issues (c)	Update figures: <i>Based on past completions, a figure of <u>211</u> <u>229.5</u> ha is considered deliverable in Sandwell over the plan period; a higher target would be unachievable / unrealistic, as the market would struggle to deliver it. The supply of new land available and suitable for employment use in Sandwell is currently <u>42</u> <u>44.5</u> ha (including past completions since 2020).</i>	Update of the EDNA	No – the proposed modification updates employment land supply figures to reflect the latest completions. It therefore does not trigger a change to the conclusions of the HRA.
AM10	Vision for Sandwell	Amend text: <i>... They benefit from <u>high quality green spaces</u>; additional landscaping schemes and increased tree cover during their everyday activities and leisure time. ...</i>	Minor wording change to emphasise importance of natural open spaces	No – the proposed modification relates to minor wording changes. It therefore does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
AM11	Table 5 – Priorities, Strategic Objectives and Policies	<p>Amend list of policies:</p> <p>Change reference to Policy SDM10 to Policy SDM9, following amalgamation of Policies SDM6 and SDM7 and consequent renumbering of following policies.</p>	Consequential change following policy number update	No – the proposed modification is an editorial update to policy numbering. It therefore does not trigger a change to the conclusions of the HRA.
AM12	Strategic Objective 4 Table 3	<p>Amend text:</p> <p><i>To protect, sustain and enhance the quality of the historic built environment <u>and the significance of heritage assets</u>, ensuring the retention of distinctive and attractive places ...</i></p>	Minor clarification - all aspects of the historic environment will be taken into consideration	No – the proposed modification relates to a minor wording change to the objectives of the SLP. It therefore does not trigger a change to the conclusions of the HRA.
AM13	Strategic Objective 5 Table 3	<p>Amend text:</p> <p><i>... areas of industrial heritage value, sites of geological and archaeological interest and locally listed buildings, structures and <u>heritage</u> historic assets.</i></p>	Correct nomenclature	No – the proposed modification relates to a minor wording change to the objectives of the SLP. It therefore does not trigger a change to the conclusions of the HRA.
AM14	Paragraph 2.14	<p>Amend figures:</p> <ul style="list-style-type: none"> <i>Sandwell is subject to a demand for 211 <u>229.5</u> ha of employment land.</i> 	Update of the EDNA	No – the proposed modification updates employment land need

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<ul style="list-style-type: none"> <i>The current supply of land available and suitable for employment use is 42 <u>44.5</u> ha (after completions between 2020 – 2022 are considered). This includes windfall supply, generated through intensification / recycling, and also includes a vacant land supply of 28ha (sites identified under Policy SEC1).</i> <i>Based on the amount of land required to grow the economy, there is a shortfall of around 169 <u>185</u> ha.</i> 		/ supply figures to reflect the latest evidence. It therefore does not trigger a change to the conclusions of the HRA.
AM15	Paragraph 3.12 (3.15)	<p>Additional text:</p> <p><i>... The Council recognises that it is not possible to provide for all the identified housing and employment land needs within its administrative boundaries, given the circumstances around land deliverability, extant land-use constraints and the need to protect its unique natural and built heritage. <u>It will continue to regularly monitor the land supply position and keep under review any opportunities for additional supply with the borough over the plan period. Mechanisms for such monitoring and review include:</u></i></p> <ul style="list-style-type: none"> <i><u>an annual Strategic Housing Land Availability Assessment (wherein density and other capacity assumptions can be reconsidered and a Call for Sites undertaken);</u></i> <i><u>the Brownfield Register;</u></i> <i><u>the forthcoming Sandwell Design Code, Masterplans or any equivalent for specific areas or sites;</u></i> <i><u>the Housing Delivery Test Action Plan (where applicable); and</u></i> <i><u>the Authority Monitoring Report.</u></i> 	Clarification of approach to monitoring	No – the proposed modification introduces additional policy justification text for clarification. It therefore does not trigger a change to the conclusions of the HRA.
AM16	Paragraph 3.14	<p>Amend text:</p> <p><i>For employment land, the EDNA establishes a need for 185 <u>229.5</u> ha of vacant land for new employment development, an anticipated level of allocations of 1,221ha of existing employment land (of which 28ha is currently vacant) and a shortfall of 169 <u>185</u> ha (accounting for additional completions identified between 2020 and 2022).</i></p>	Update of the EDNA	No – the proposed modification updates employment land need / supply figures to reflect the latest evidence. It therefore does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?						
AM17	Paragraph 3.17	<p>Amend text:</p> <p><i>... if a shortfall remains over and above existing and anticipated contributions (which is likely), Sandwell will undertake further work as appropriate to identify how the shortfall might be addressed. <u>This work includes those mechanisms set out at paragraph 3.15 to monitor and review land supply within Sandwell borough.</u></i></p>	Consequential change related to paragraph 3.12 change	No – the proposed modification introduces additional policy justification text for clarification. It therefore does not trigger a change to the conclusions of the HRA.						
AM18	Paragraph 3.53	<p>Amend text:</p> <p><i>3.53 The area has also been identified as a location for waste operators, which could detract from its amenity; the challenge will be to improve the negative environmental impacts that generally accompany these operations.</i></p>	Clarification	No – the proposed modification relates to minor wording changes to policy introduction text. It therefore does not trigger a change to the conclusions of the HRA.						
AM19	Table 4 Regeneration projects	<p>Amend proposed delivery dates:</p> <table border="1"> <thead> <tr> <th>Regeneration Area</th> <th>Project</th> <th>Proposed delivered date</th> </tr> </thead> <tbody> <tr> <td><i>West Bromwich</i></td> <td><i>Urban Greening Retail Diversification programme West Bromwich mixed-use community</i></td> <td><i>2024 2025 2026 2034</i></td> </tr> </tbody> </table>	Regeneration Area	Project	Proposed delivered date	<i>West Bromwich</i>	<i>Urban Greening Retail Diversification programme West Bromwich mixed-use community</i>	<i>2024 2025 2026 2034</i>	Factual update	No – the proposed modification updates the table listing proposed regeneration projects to reflect the latest expected delivery dates. It therefore does not trigger a change to the conclusions of the HRA.
Regeneration Area	Project	Proposed delivered date								
<i>West Bromwich</i>	<i>Urban Greening Retail Diversification programme West Bromwich mixed-use community</i>	<i>2024 2025 2026 2034</i>								

Ref	Page / paragraph / policy reference	Proposed change		Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
				<u>2041</u>	
	<i>Carter's Green</i>	<i>Carter's Green residential community</i>		<u>2034</u> <u>2037</u>	
	<i>Dudley Port and Tipton</i>	<i>Dudley Port Integrated Transport Hub</i> <i>Dudley Port Garden City</i> <i>Tipton Town Centre Regeneration (Owen Street District Centre)</i>		<u>2025</u> <u>2026</u> <u>2040</u> <u>2041</u> <u>2026</u> <u>2027</u>	
	<i>Smethwick</i>	<i>Construction of Midland Metropolitan University Hospital and associated University Learning Campus</i> <i>Transport improvements as part of the Smethwick to Birmingham Inclusive Growth Corridor</i> <i>Rolfe Street Canalside Regeneration</i> <i>Grove Lane Regeneration</i> <i>Long-Term Plan for Smethwick</i>		<u>2025</u> <u>2026</u> 2027 2029 2029 2034	
	<i>Wednesbury</i>	<i>Wednesbury High Street Heritage Action Zone</i> <i>Wednesbury to Brierley Hill Metro Extension</i> <i>Wednesbury Town Centre Improvements (Levelling Up Partnership)</i>		<u>2025</u> <u>2024</u> <u>2026</u> <u>2025</u>	

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
AM20	SDS8 paragraph 3.104	<p>Capitalize Local Nature Recovery Strategy:</p> <p>... biodiversity net gain, the <u>Local Nature Recovery Strategy</u>, the retention of trees and hedgerows, ...</p>	Correction	No – the proposed modification relates to a minor typographical change. It therefore does not trigger a change to the conclusions of the HRA.
AM21	Appendix A [see also MM12, MM14]	<p>Amend text to reflect updated position:</p> <p><u>Black Country Local Nature Recovery Opportunity Map</u> <u>West Midlands Local Nature Recovery Strategy</u></p> <p>....</p> <p><i>The Environment Act 2021 made Local Nature Recovery Strategies mandatory in England. Together the strategies are to cover the whole of the country, and the Secretary of State is to determine the areas within England to which individual Local Nature Recovery Strategies are to relate.</i></p> <p><u>Black Country Local Nature Recovery Opportunity Map (draft April 2021)</u></p> <p><i>A requirement of the Environment Act 2021 is a Local Habitat Map that identifies the existing distribution of different habitat types and the location of areas already important for biodiversity, overlaid by locations considered suitable for delivering the outcomes and measures identified in the Statement of Biodiversity Priorities.</i></p> <p><i>The emerging Sandwell Local Nature Recovery Opportunity Map</i> <u>West Midlands Local Nature Recovery Strategy</u> forms part of a Birmingham and Black Country region-wide map and strategy approach which <u>that</u> has been produced <u>in partnership with</u> by the <u>West Midlands Combined Authority (WMCA)</u> Wildlife Trust for Birmingham and the Black Country and the Local Environmental Records Centre (EcoRecord). This has been undertaken through analysis of local and national data sets including designated sites, priority habitats, species distribution, land use and ecological connectivity. The <u>map strategy</u> comprises several components that depict areas of current high ecological value, the ecological connectivity between these areas, and prioritises opportunities for investment in nature's recovery on a landscape scale.</p>	Update and clarification of information following WMCA work on LNRS	No – the proposed modification updates the title and associated text to reflect the progression of the West Midlands Local Nature Recovery Strategy and provide up-to-date information and clarity. It therefore does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p><i>Further details can be found on the WMCA website including detailed mapping of the ecological and biodiversity value of the region showing how the LNRS will help deliver improvements and opportunities across the area.</i></p> <p>https://www.wmca.org.uk/what-we-do/environment-energy/west-midlands-local-nature-recovery-strategy/</p> <p>Delete remaining text in Appendix A: from heading, “Core Landscapes” to end of text under heading, “National Habitat Network”</p>		
	Glossary	<p>Amend the definition in the plan’s Glossary to refer to the current LNRS or its successor:</p> <p><i><u>Local nature recovery strategies are a nationwide system of spatial strategies for nature and environmental improvement required by law under the Act. Each strategy must:</u></i></p> <ul style="list-style-type: none"> • <i><u>agree priorities for nature's recovery;</u></i> • <i><u>map the most valuable existing areas for nature; and</u></i> • <i><u>map specific proposals for creating or improving habitat for nature and wider environmental goals (adopting nature-based solutions).</u></i> <p><i><u>Together, the strategies will cover the whole of England with no gaps or overlaps. The main purpose of the strategies is to identify locations and opportunities to create or improve habitat types most likely to provide the greatest benefit for nature and the wider environment.</u></i></p> <p><i><u>The strategies do not require the owners and managers of the land identified to make any changes. Instead, the government is encouraging action through, for example, opportunities for funding and investment. Having both actions for nature recovery and nature-based solutions will help join up work to improve how land is managed for different environmental reasons and find activities that have multiple benefits.</u></i></p> <p><i><u>Local nature recovery strategies are documents designed to agree priorities for nature recovery and propose actions in the locations where it would make a particular contribution to achieving those priorities.</u></i></p> <p><i><u>The Secretary of State for Environment, Food and Rural Affairs has appointed 48 responsible authorities to lead on preparing a local nature recovery strategy for their area. Together these 48 strategy areas cover the whole of England with no gaps or overlaps.</u></i></p>	<p>Clarification and further information Consequential to amendments to paragraph 4.35 – see MM16</p>	<p>No – the proposed modification relates to minor wording changes to the SLP glossary for clarity. It therefore does not trigger a change to the conclusions of the HRA.</p>

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<p><i>Responsible authorities will work with other organisations and partners in their area to agree what should be included in their local nature recovery strategy. The responsible body for the West Midlands is the WMCA. ...</i></p> <p>Consequential updates to the text of Appendix A to reflect the updated position.</p>		
AM22	Paragraph 4.16	<p>Amend text:</p> <p><i>Development should also contribute to wildlife and habitat connectivity in the wider area, in line with the Biodiversity Action Plan, River Basin Management Plans and the Black Country and West Midlands Local Nature Recovery Strategy.</i></p>	Minor correction – include reference to further supporting evidence reflecting local authority duty to have regard to them under the Water Management Regulations 2017	No – the proposed modification relates to minor wording changes to policy justification text. It therefore does not trigger a change to the conclusions of the HRA.
AM23	Paragraph 4.27	<p>Amend text:</p> <p><i>... including ones under threat such as swifts, house martins, swallows, starlings and house sparrows. ...</i></p>	Factual correction - swallows do not use swift bricks	No – the proposed modification relates to minor wording changes to policy justification text. It therefore does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
AM24	Paragraph 4.27	Amend text: ... Best practice guidance on their installation and use <u>should be followed, and</u> can be found in BS 42021	Clarify focus on using guidance when bricks are installed	No – the proposed modification relates to minor wording changes to policy justification text. It therefore does not trigger a change to the conclusions of the HRA.
AM25	Paragraph 4.32	Delete text: 4.34 The four Black Country Authorities jointly commissioned a Local Nature Recovery Strategy from the Birmingham and Black Country Wildlife Trust during 2020 – 21. This document produced opportunities mapping that future development proposals will need to consider in demonstrating how they deliver biodiversity benefits appropriate to the zones identified.	Consequential update following changes to Appendix A and elsewhere in SLP	No – the proposed modification relates to minor wording changes to policy justification text. It therefore does not trigger a change to the conclusions of the HRA.
AM26	Paragraph 4.86	Amend text: <i>The Rowley Hills Strategic Open Space (RHSOS) designation was identified <u>in part</u> at the time of the West Midlands Structure Plan ^(x).</i> <i>^(x) The Structure Plan was adopted in June 1978, reviewed in 1982 and amended in 1986. The Rowley Hills were identified as an area of linear open space under policy SPP6.</i>	Factual clarification	No – the proposed modification relates to minor wording changes to policy justification text. It therefore does not trigger a change to the conclusions of the HRA.
AM27	Paragraph 4.96	Amend text:	Clarification	No – the proposed modification relates to

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
		<i>Many canals are also designated as local nature sites wildlife sites and corridors either in part or for long sections of their corridor course.</i>		minor wording changes to policy justification text. It therefore does not trigger a change to the conclusions of the HRA.
AM28	Paragraph 4.99	Amend text: <i>To re-open them or intensify activity on these sections of the network could have an adverse impact on sensitive habitats and species. An ecological impact assessment may be required prior to restoration.</i>	Clarification	No – the proposed modification relates to minor wording changes to policy justification text. It therefore does not trigger a change to the conclusions of the HRA.
AM29	various	Correct terminology throughout SLP around use of “heritage” and “historic”	Consequential corrections throughout	No – the proposed modification is an editorial update to standardise terminology. It therefore does not trigger a change to the conclusions of the HRA.
AM30	Paragraph 4.108	Amend text: <i>... national guidance exists to provide for the protection of both statutorily designated and undesignated heritage assets, ...</i>	Correct nomenclature	No – the proposed modification relates to minor wording changes to policy justification text. It

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
				therefore does not trigger a change to the conclusions of the HRA.
AM31	Paragraph 4.113	Amend text: <i>... b) their significance as <u>heritage</u> historic assets can be protected; ...</i>	Correct nomenclature	No – the proposed modification relates to minor wording changes to policy justification text. It therefore does not trigger a change to the conclusions of the HRA.
AM32	Paragraph 4.114	Amend text: <i>Heritage assets are irreplaceable resources. and harm to them should be wholly exceptional</i>	Clarification	No – the proposed modification relates to minor wording changes to policy introductory text. It therefore does not trigger a change to the conclusions of the HRA.
AM33	Paragraph 4.126	Delete paragraph - a duplicate of paragraph 4.109.	Correction	No – the proposed modification deletes duplicated text. It therefore does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
AM34	SCC5.3a. iv	<p>Spelling correction of “other”</p> <p>iv. ... <i>The SFRA can be used to identify where there are flooding issues from sources others than rivers.</i></p>	Spelling correction	No – the proposed modification corrects a typographical error. It therefore does not trigger a change to the conclusions of the HRA.
AM35	Paragraph 6.14.c	<p>Spelling correction</p> <p>c) ... as set out in Policies SHO3, SHO4 and SHO5;</p>	Spelling correction	No – the proposed modification corrects a typographical error. It therefore does not trigger a change to the conclusions of the HRA.
AM36	Paragraph 6.28	<p>Amend text:</p> <p>... not viable for a housing developer <u>development</u> to fund ...</p>	Correction	No – the proposed modification corrects a typographical error. It therefore does not trigger a change to the conclusions of the HRA.
AM37	SHW3 Paragraph 6.30	<p>New paragraph 6.30 (renumber from this point):</p> <p><i>6.30 Given Sandwell's location, high levels of previous and extant industrial activity and the presence of significant infrastructure (in particular the M5 and M6 motorways), the whole borough is an Air Quality Management Area (AQMA).</i></p>	Clarification	No – the proposed modification relates to minor wording changes to policy introductory text. It therefore does not trigger a change to

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
				the conclusions of the HRA.
AM38	Paragraph 8.4	<p>Amend text:</p> <p><i>In terms of Sandwell's specific employment land needs, the evidence contained within the latest Black Country Economic Development Needs Assessment (EDNA) <u>2024</u>³ provides an overall target figure for the Black Country area of 494 634.7 hectares (<u>30.21</u> 23.52 hectares per annum) from 2020 to 2041 with the target figure for Sandwell being <u>185</u> 203.5 hectares or <u>8.81</u> 9.69 hectares per annum...</i></p>	Update of the EDNA	No – the proposed modification updates employment land need / supply figures to reflect the latest evidence. It therefore does not trigger a change to the conclusions of the HRA.
AM39	Paragraph 8.5	<p>Amend text:</p> <p><i>It is estimated that <u>60</u> 65 hectares is required for manufacturing uses and <u>126</u> 138.5 hectares is required for storage and distribution uses (based on 32% manufacturing and 68% distribution and logistics).</i></p>	Update of the EDNA	No – the proposed modification updates employment need figures to reflect the latest evidence. It therefore does not trigger a change to the conclusions of the HRA.
AM40	Paragraph 8.6	<p>Amend text:</p> <p><i>Within the EDNA, the overall employment land need figure for the Black Country is stated to increase from 470 hectares to 494 634.7 hectares, to include the employment land lost because of planned redevelopment to alternative uses. In Sandwell, that total target figure of <u>186</u> 203.5 hectares is increased to <u>211</u> 229.5 hectares through the addition of 26 hectares.....</i></p>	Update of the EDNA	No – the proposed modification updates employment need figures to reflect the latest evidence. It therefore does not trigger a change to the conclusions of the HRA.

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				conclusions of the HRA.
AM41	Paragraph 8.12	<p>Amend text:</p> <p><i>...the EDNA recommends that the SLP should provide for a minimum of <u>211</u> <u>229.5</u> ha of land (this includes 26 ha of employment land lost to other uses) for employment development, for the period up to 2041. This is based on an average provision of <u>0.07</u> <u>10.92</u> ha per annum....</i></p>	Update of the EDNA	No – the proposed modification updates employment need figures to reflect the latest evidence. It therefore does not trigger a change to the conclusions of the HRA.
AM42	Paragraph 8.14	<p>Amend text:</p> <p><i>170 <u>201</u> ha of the employment land need arising in Sandwell cannot be met solely within the Borough. Land to address this unmet need ...</i></p>	Update of the EDNA	No – the proposed modification updates employment need figures to reflect the latest evidence. It therefore does not trigger a change to the conclusions of the HRA.
AM43	Paragraph 8.31	<p>Amend text:</p> <p><i>The broad extent of the Local Employment Areas is <u>are</u> shown on the Employment Land Key diagram and the detailed boundaries are on the Sandwell Local Plan Policies Map.</i></p>	Correction – no employment key diagram in SLP	No – the proposed modification corrects reference to the policies map. It therefore does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
AM44	Paragraph 9.70 (a)	<p>Delete reference to Retail Core</p> <p><i>In-centre locations for appropriate uses¹⁹⁷ are those defined in centres, such as Primary Shopping Areas / retail core and centre boundaries....</i></p>	Update and consistency [see MM47]	No – the proposed modification relates to a minor typographical change. It therefore does not trigger a change to the conclusions of the HRA.
AM45	Paragraph 9.89	<p>Consistent references to Primary Shopping Area, not Retail Core:</p> <p>a) <i>Bearwood contains a retail core Primary Shopping Area that begins south of Belmont Road and continues to the centre's boundary with Hagley Road.</i></p>	Update and consistency [see MM47]	No – the proposed modification relates to minor wording changes to ensure consistent terminology. It therefore does not trigger a change to the conclusions of the HRA.
AM46	Paragraph 9.146	<p>Consistent references to Primary Shopping Area, not Retail Core:</p> <p><i>Cape Hill contains a retail core Primary Shopping Area which includes most of the centre. The spurs of retail activity off Waterloo Road, Shireland Road and the east side of Cape Hill from its junction at Durban Road are not included within the retail core Primary Shopping Area as they lie further away from the main retail hub of the centre and have a lower footfall.</i></p>	Update and consistency [see MM47]	No – the proposed modification relates to minor wording changes to ensure consistent terminology. It therefore does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
AM47	Paragraph 9.233	<p>Consistent references to Primary Shopping Area, not Retail Core:</p> <p><i>Oldbury Town Centre does not have an existing Primary Shopping Area (PSA) / Retail Core. Due to the nature of Oldbury's primary role as a service-driven town centre, a PSA <u>Primary Shopping Area</u> / Retail Core is not considered necessary.</i></p>	Update and consistency [see MM47]	No – the proposed modification relates to minor wording changes to ensure consistent terminology. It therefore does not trigger a change to the conclusions of the HRA.
AM48	Paragraph 9.286	<p>Consistent references to Primary Shopping Area, not Retail Core:</p> <p><i>Primary Shopping Area / Retail Core</i></p> <p><i>Wednesbury has an identified retail core <u>Primary Shopping Area</u>, which has not changed recently.</i></p>	Update and consistency [see MM47]	No – the proposed modification relates to minor wording changes to ensure consistent terminology. It therefore does not trigger a change to the conclusions of the HRA.
AM49	Paragraph 11.1	<p>Amend text:</p> <p><i>The first element, the Core Strategy: <u>Reimagining the West Midlands</u>, has been approved.</i></p>	Update	No – the proposed modification relates to minor wording changes. It therefore does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
AM50	Paragraph 11.26	Amend text: ... 11.26 The West Midlands Key Route Network (KRN) (Figure 14) caters ...	Clarification	No – the proposed modification adds a cross reference to a figure. It therefore does not trigger a change to the conclusions of the HRA.
AM51	Paragraph 11.42	Correction: ... particularly <u>the</u> Stourbridge – Walsall – Lichfield <u>corridor</u> ...	Correction to wording	No – the proposed modification relates to minor wording changes. It therefore does not trigger a change to the conclusions of the HRA.
AM52	Paragraph 13.41	Amend text: <i>If a development is likely to have an unacceptable impact on the future of the site as a location for waste management, it will be refused, <u>in accordance with the 'agent of change' principle</u>.</i>	Clarification	No – the proposed modification relates to minor wording changes to policy justification text. It therefore does not trigger a change to the conclusions of the HRA.
AM53	SCO2.3	Amend footnote 239: ²³⁹ See also Policy SNE2 <u>and SNE6.2. b</u>	Clarification	No – the proposed modification updates a footnote for clarity. It therefore does not

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				trigger a change to the conclusions of the HRA.
AM54	Paragraphs 15.50 – 15.54	<p>Amend text and footnotes:</p> <p>15.50 The Joint Strategic Needs Assessment (JSNA) for Sandwell identifies that the general health of people in Sandwell is improving, but not as fast as the England average^w. However, the Office for Health Improvement and Disparities has identified that the prevalence of Year 6 children being overweight is worsening, with Sandwell having the highest number within the West Midlands region, according to 2021-22 data^x....</p> <p>^w https://www.sandwelltrends.info/wp-content/uploads/sites/5/2023/12/JSNA-Chapter1-Dec-23.pdf</p> <p>https://www.sandwelltrends.info/wp-content/uploads/sites/5/2018/06/JSNA_Obesity_May_2011.pdf; https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/articles/subnationalindicatorsexplorer/2022-01-06#E08000028</p> <p>^x https://www.sandwelltrends.info/healthy-weight</p> <p>... 15.52 In 2021–22 2024 - 25, 44.925% of reception-aged children in Sandwell were <u>overweight or obese</u>, compared to an average of 40.124% for England^z. This rose to 34.46% of Year 6 children in Sandwell, compared to 23.436% nationally^A. Over-18s also fared badly, with 34.371.6% of all adults in Sandwell being overweight or obese, compared to 25.964.5% in England</p> <p>^z https://www.gov.uk/government/statistics/health-of-the-region-data-explorer - select West Midlands from the “select region” drop down list and Sandwell from the local authority one: then go to page 18</p> <p>^A https://www.gov.uk/government/statistics/health-of-the-region-data-explorer - select West Midlands from the “select region” drop down list and Sandwell from the local authority one: then go to page 19</p>	Update and removal of dead hyperlinks	No – the proposed modification updates footnote links and data to reflect the latest evidence. It therefore does not trigger a change to the conclusions of the HRA.
AM55	Chapter 16 Monitoring and indicator table	Amend timescale from Plan Period to <u>Annually</u> for most indicators.	Provide clarity that most indicators will be monitored annually	No – the proposed modification corrects monitoring indicator timescales. It therefore does not trigger a change to

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?																			
			over the plan period.	the conclusions of the HRA.																			
AM56	New monitoring indicator SHOa Current monitoring Indicator SHOa - b	<p>New monitoring indicator:</p> <table border="1"> <thead> <tr> <th>Monitoring Indicator</th><th>Target</th><th>Monitoring Frequency</th><th>Timescale</th></tr> </thead> <tbody> <tr> <td><i>SHOa - Sandwell</i> <i>housing land supply</i></td><td><i>Maintain or exceed a Five-Year Housing Land Supply throughout plan period</i></td><td><i>Annually</i></td><td><i>Plan period</i></td></tr> </tbody> </table> <p>Amend indicators:</p> <table border="1"> <thead> <tr> <th>Monitoring Indicator</th><th>Target</th><th>Monitoring Frequency</th><th>Timescale</th></tr> </thead> <tbody> <tr> <td><i>SHOa SHOb</i> - Annual Sandwell net housing completions</td><td><i>Phased housing targets for Sandwell as set out in Table 5: Housing Land Supply—sources</i> <i>Meet or exceed delivery of housing requirement</i></td><td><i>Monitor completions against annualised requirement and review trajectory annually (Appendix I)</i></td><td><i>Plan period</i></td></tr> <tr> <td><i>SHOa c</i> - Net affordable units completed</td><td><i>25% on eligible sites</i> <i>In accordance with stepped requirement (10-25%) detailed at policy SHO4</i></td><td><i>Annually</i></td><td><i>Plan period</i></td></tr> </tbody> </table>	Monitoring Indicator	Target	Monitoring Frequency	Timescale	<i>SHOa - Sandwell</i> <i>housing land supply</i>	<i>Maintain or exceed a Five-Year Housing Land Supply throughout plan period</i>	<i>Annually</i>	<i>Plan period</i>	Monitoring Indicator	Target	Monitoring Frequency	Timescale	<i>SHOa SHOb</i> - Annual Sandwell net housing completions	<i>Phased housing targets for Sandwell as set out in Table 5: Housing Land Supply—sources</i> <i>Meet or exceed delivery of housing requirement</i>	<i>Monitor completions against annualised requirement and review trajectory annually (Appendix I)</i>	<i>Plan period</i>	<i>SHOa c</i> - Net affordable units completed	<i>25% on eligible sites</i> <i>In accordance with stepped requirement (10-25%) detailed at policy SHO4</i>	<i>Annually</i>	<i>Plan period</i>	Correction to reflect updated monitoring timescales, five-year position and affordable housing requirement No – the proposed modification introduces a new monitoring indicator and updates other existing indicators. It therefore does not trigger a change to the conclusions of the HRA.
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AM57	Monitoring Indicator SECa	<p>Monitoring Indicator</p> <p><i>SECa</i> - Employment land completions on sites allocated through Policy SEC1 Target 42 <i>44.5</i> ha</p>	Update of the EDNA	No – the proposed modification updates a monitoring indicator to reflect the latest evidence. It therefore does not trigger a change to the																			

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				conclusions of the HRA.																		
AM58	Monitoring Indicator SECa	<p>Monitoring Indicator</p> <p>SECa - Employment land completions on sites allocated through Policy SEC1 Target 42 42 44.5 ha</p>	Update of the EDNA	No – the proposed modification updates a monitoring indicator to reflect the latest evidence. It therefore does not trigger a change to the conclusions of the HRA.																		
AM59	Development Management monitoring indicators	<p>Amend list of policies and renumber:</p> <p>...</p> <p><i>Policy SDM6 - Hot Food Takeaways</i></p> <p><i>Policy SDM7 - Management of Hot Food Takeaways</i></p> <p><i>Policy SDM8 - Gambling activities and alternative financial services</i></p> <p><i>Policy SDM9-8 - Community Facilities</i></p> <p><i>Policy SDM10-9 - Telecommunications</i></p>	Consequential change following merging of two policies	No – the proposed modification updates the list of policies and policy numbers to reflect other proposed modifications. It therefore does not trigger a change to the conclusions of the HRA.																		
AM60	Monitoring indicators	<p>Insert new monitoring indicators for strategic sites:</p> <table border="1"> <thead> <tr> <th>Policies</th> <th>Target</th> <th>Timescale</th> </tr> </thead> <tbody> <tr> <td><i>Policy SSH1 – Edwin Richards Quarry</i></td> <td></td> <td></td> </tr> <tr> <td><i>Policy SSH2 – Friar Park</i></td> <td></td> <td></td> </tr> <tr> <td><i>Policy SSH3 – Rattlechain and land between Addington Way and River Tame</i></td> <td></td> <td></td> </tr> <tr> <td><i>Policy SSH4 – North Smethwick Canalside</i></td> <td></td> <td></td> </tr> <tr> <td><i>Policy SSH5 – Abberley Street</i></td> <td></td> <td></td> </tr> </tbody> </table>	Policies	Target	Timescale	<i>Policy SSH1 – Edwin Richards Quarry</i>			<i>Policy SSH2 – Friar Park</i>			<i>Policy SSH3 – Rattlechain and land between Addington Way and River Tame</i>			<i>Policy SSH4 – North Smethwick Canalside</i>			<i>Policy SSH5 – Abberley Street</i>			Consequential amendments following identification of strategic development sites	No – the proposed modification introduces monitoring indicators to reflect new policies. It therefore does not trigger a change to the
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		<p><u>Policy SSH6 – Cape Arm Cranford Street</u></p> <p><u>Policy SSH7 – Cranford Street / Heath Street / Canal</u></p> <p><u>Policy SSH8 – Grove Lane / Cranford Street / London Street</u></p> <p><u>Policy SSH9 – Grove Street / MMUH</u></p> <p><u>Policy SSH10 – Moilliett Street Park</u></p> <p><u>Policy SSM1 – Lion Farm</u></p> <p><u>Policy SSM2 – Cultural Quarter</u></p> <p><u>Policy SSM3 – George Street Living</u></p> <p><u>Policy SSM4 – Queens Square</u></p> <p><u>Policy SSM5 – West Bromwich Central</u></p> <p><u>Policy SSE1 – Coneygree Business Park (open land)</u></p>		conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?								
		<table border="1"> <tr> <td></td><td></td><td><i>development proposals.</i></td><td></td></tr> <tr> <td><i>SSEa - Sandwell net strategic employment allocations completions</i></td><td><i>7.22 ha</i></td><td><i>2024 - 2041</i></td><td></td></tr> </table>			<i>development proposals.</i>		<i>SSEa - Sandwell net strategic employment allocations completions</i>	<i>7.22 ha</i>	<i>2024 - 2041</i>			
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<i>SSEa - Sandwell net strategic employment allocations completions</i>	<i>7.22 ha</i>	<i>2024 - 2041</i>										
AM61	Chapter 2 – Spatial Strategy Chapter 11 - Transport	Include Canal Network on Figure 2 – Sandwell Spatial Map and Figure 14 – Existing Transport Network	To recognise the importance of the canal network as both a transport and cultural facility	No – the proposed modification updates a figure in the Plan to provide up-to-date visual context. It therefore does not trigger a change to the conclusions of the HRA.								
AM62	Figure 13	Replace plan of Wednesbury Town Centre with one of West Bromwich Town Centre.	correction	No – the proposed modification corrects a figure in the Plan to provide visual context. It therefore does not trigger a change to the conclusions of the HRA.								
AM63	Figures 14,16	Replace maps with amended versions, as per representation (PAM45, PAM 69).	Correct errors	No – the proposed modification corrects figures in the Plan to provide visual context. It therefore does not trigger a change to the conclusions of the HRA.								

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
AM64	Interactive Policies Map	Add Smethwick Police Station, Wednesbury Police Station and Windmill House housing allocations to the interactive Policies Map	Minor correction - sites missing from the Policies Map, but on the version submitted to Cabinet	No – the proposed modification corrects figures in the Plan to provide visual context. It therefore does not trigger a change to the conclusions of the HRA.
AM65	Interactive Policies Map	Remove the Severn Trent Water site at Castle Road East/Harbourne Road and National Grid Site at Portway Road from the open space layer	Factual correction - sites are not publicly accessible open spaces	No – the proposed modification corrects figures in the Plan to provide visual context. It therefore does not trigger a change to the conclusions of the HRA.
AM66	Interactive Policies Map	Amend the eastern boundary of the Waterfall Lane open space designation in Rowley Regis to remove around ten residential gardens from the designation on the open space layer.	Factual correction - sites are not publicly accessible open spaces	No – the proposed modification corrects figures in the Plan to provide visual context. It therefore does not trigger a change to the conclusions of the HRA.
AM67	Interactive Policies Map	Amend the boundary of the Powke Lane Crematorium open space designation in Rowley Regis to remove areas of residential gardens from the designation on the open space layer.	Factual correction - sites are not publicly	No – the proposed modification corrects figures in the Plan to provide visual context. It therefore does not

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the AM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
			accessible open spaces	trigger a change to the conclusions of the HRA.

A.4 Policies Map Modifications

A.1.1.6 Fifteen further Policies Map Modifications have been proposed by SMBC. These relate to minor corrections, updates, and adjustments to designations, boundaries, labels, and layers to ensure accuracy and consistency with the Plan and reflect the latest evidence. The Policies Map Modifications provide updated visual context, and do not introduce any new information that will require further assessment in the HRA process.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the PM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
PM1	SCE1	change colour designation for West Brom Town Centre	Update	No – the proposed modification updates the colour of a mapped designation as a minor formatting change. It therefore does not trigger a change to the conclusions of the HRA.
PM2	SCE1	Table 10. New Local Centres x 2. On adoption change to Local Centres (i.e. delete reference to "new"). Update the rest of the plan and policies map for consistency.	Update	No – the proposed modification updates designations on the policies map for clarity. It therefore does not trigger a change to the conclusions of the HRA.
PM3	SWB1	Check the pdf and interactive versions of the policies map for accuracy and consistency in respect of West Brom centre retail core / primary shopping area.		No – the proposed modification updates designations on the policies map for clarity. It therefore does not trigger a change to the conclusions of the HRA.
PM4		Correct Policies Map correction (overlap with GB)	Correction	No – the proposed modification corrects an error on the policies map. It therefore does not trigger a

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the PM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
				change to the conclusions of the HRA.
PM5	Site allocation SH19	Horseley Heath etc Update Policies Map to remove SLINC already de-allocated and built on.	Update	No – the proposed modification updates designations on the policies map for clarity. It therefore does not trigger a change to the conclusions of the HRA.
PM6	Site allocation	Rowley Regis Golf Course – include on policies map	Update	No – the proposed modification updates the policies map to include a site allocation. It therefore does not trigger a change to the conclusions of the HRA.
PM7	Habitat bank sites	Put six habitat bank sites on the Policies Map	Clarification	No – the proposed modification updates designations on the policies map for clarity. It therefore does not trigger a change to the conclusions of the HRA.
PM8	Policy SMI2.3	Define Consideration Zones" in the Glossary and show on Policies Map	Clarification	No – the proposed modification updates designations on the policies map for clarity. It therefore does not trigger a change to the conclusions of the HRA.
PM9	SHW3	Make the AQMA a layer on the Policies Map	Clarification	No – the proposed modification updates designations on the policies map for clarity. It therefore does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the PM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
PM10	SHW4	Remove the Severn Trent Water site at Castle Road East/Harbourne Road and National Grid Site at Portway Road from the open space layer	Factual correction - sites are not publicly accessible open spaces	No – the proposed modification corrects an error on the policies map. It therefore does not trigger a change to the conclusions of the HRA.
PM11	all	Check Policies Map key shows Primary Shopping Area and not Retail Core	Correction	No – the proposed modification corrects an error on the policies map. It therefore does not trigger a change to the conclusions of the HRA.
PM12	Strategic site allocations	Include strategic site allocations as change to Policies Map	Clarification	No – the proposed modification updates the policies map to include strategic allocations. It therefore does not trigger a change to the conclusions of the HRA.
PM13	Housing allocations	Add Smethwick Police Station and Windmill House housing allocations to the interactive Policies Map	Correction - sites missing from the Policies Map, but on the version submitted to Cabinet	No – the proposed modification corrects an error on the policies map. It therefore does not trigger a change to the conclusions of the HRA.
PM14	Interactive Policies Map	Amend the eastern boundary of the Waterfall Lane open space designation in Rowley Regis to remove around ten residential gardens from the designation on the open space layer.	Factual correction - sites are not publicly accessible open spaces	No – the proposed modification corrects an error on the policies map. It therefore does not trigger a change to the conclusions of the HRA.

Ref	Page / paragraph / policy reference	Proposed change	Reason	Does the PM trigger a change to the conclusions of the 2024 Submission HRA or a new LSE?
PM15	Interactive Policies Map	Amend the boundary of the Powke Lane Cemetery open space designation in Rowley Regis to remove areas of residential gardens from the designation on the open space layer.	Factual correction - sites are not publicly accessible open spaces	No – the proposed modification corrects an error on the policies map. It therefore does not trigger a change to the conclusions of the HRA.

Habitats Regulations Assessment
Sustainability Appraisal
Strategic Environmental Assessment
Landscape Character Assessment
Landscape and Visual Impact Assessment
Green Infrastructure
Expert Witness
Ecological Impact Assessment
Habitat and Ecology Surveys
Biodiversity Net Gain



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