Sandwell Metropolitan Borough Council

Brades Village
Supplementary Planning Document

Consultation Statement

September 2006
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Introduction

This Consultation Statement has been prepared in response to the requirement in Reg. 18(4)(b) of the Town and Country Planning (Local Development) (England) Regulations 2004.

The new local development frameworks planning system that has been ushered in by the Planning and Compulsory Purchase Act (2004) and related legislation, regulations and guidance, requires that is geared to promoting and assisting involvement in the planning process.

The Council has produced a Draft Statement of Community Involvement, which had been prepared in line with government legislation, regulations and guidance, which sets out how the Council intend to involve the people of Sandwell in the planning process. The document has undergone examination and is due to be adopted January 2007.

The Sandwell Statement of Community Involvement provides guidance in the form of a checklist of tasks that should be carried out during the consultation stage of a supplementary planning document. These include:

- Letters and document distribution
- Documents placed at key locations and on website
- Adverts in local papers
- Launch events, forums and displays
- Town Committee Presentations
- Feedback

Consultation undertaken on the Draft Brades Village SPD

The consultation process for the Draft Brades Village Supplementary Planning Document (SPD) was undertaken in line with the Council’s Statement of Community Involvement (SCI), which set out the guidelines for consultation on supplementary planning documents.

The Council engaged in a six week period of consultation on the Brades Village SPD in accordance with Reg. 18(3) of the Town and Country Planning (Local Development) (England) Regulations 2004, commencing on 17th July and ending on 28th August, though this was extended a further day to 29th August due to the previous end date being a bank holiday.

The Draft Brades Village SPD was included as a “Matter of Interest” at Oldbury Town Committee Meeting on 13th June 2006. There is a town committee within each of the six towns, made up of all the elected members for that town. Members of the public are encouraged to attend and it was therefore seen as a good opportunity to raise awareness of the document.
Leaflets were delivered to local residents two weeks prior to the consultation period commencing in an attempt to raise awareness of the consultation on the Draft SPD. These leaflets also invited residents to the consultation event.

Letters were sent out to the specific consultees with copies of the Draft SPD (and copies of the SA to the consultation bodies) during the week prior to consultation commencing.

Letters and leaflets (same as sent to residents) were sent out to local businesses with copies of the Draft SPD during the week prior to consultation commencing.

Copies of the Draft SPD were placed at key locations: Sandwell Council, Development House and Oldbury Library prior to the consultation commencing.

Legal notices were issued in the local newspapers Express and Star and Evening Mail on 17th July 2006. These can be viewed in Appendix 1 to this Consultation Statement.

A public consultation event was held at Tividale Community Centre on 19th July 2006, with the aim of providing residents with an opportunity to view the document and plans and discuss any issues. This was also seen as an opportunity to raise awareness of the Draft SPD’s existence and that a six week period of formal consultation had already commenced, during which local residents could have a level of input.

Issues raised at the consultation event included:

- Traffic problems
- Crime, safety and privacy
- The future for industry in the area and the relationship with housing
- Discussions in the form of telephone conversations and meetings instigated by consultees, residents and landowners occurred throughout the consultation period with the aim of furthering understanding of the Draft SPD, voicing points of concern to be addressed and resolved or putting forward requests. In most instances these discussions acted as the basis upon which representations would later be submitted.

A total of 59 representations were received in response to the Draft SPD and SA at various points throughout the six week consultation period. A petition signed by the residents of Hill Bank was also submitted in opposition to the potential opening up of Hill Bank as a through route.

**Sustainability Appraisal**

The Sustainability Appraisal (SA) forms an important part of the SPD within the new planning system, as it takes account of the potential social, economic and environmental effects of the document. In line with legislation and guidance the Council has consulted the Consultation Bodies (the Countryside Agency, English
Heritage, English Nature and the Environment Agency) during the SA process at the Screening and Scoping stages in order to determine the scope and level of detail of the SA.

The Screening Statement was consulted on during January 2006 and the Scoping Report was consulted on during February 2006 for the statutory five week period in accordance with Reg. 12(6) of the Environmental Assessment of Plans and Programmes Regulations 2004.

The Draft SA document was consulted on along with the Draft SPD and representations received (not only from the four consultation bodies) were taken into consideration when amending the document, as was the process with the Draft SPD.

Consultation Responses

The Council received a total of 59 formal representations to the Draft Brades Village SPD. A summary of these is provided below, with full details provided in the Schedule of Representations, which is appended to this Consultation Statement.

- Opening up of Hill Bank
- Traffic problems
- Loss of green space and community facilities at Tividale Community Recreational Centre
- Provision of new open space
- Crime, safety and privacy
- Relationship between industry and residential
- Contamination
- Biodiversity
- Flooding
- Air quality
- Status of existing buildings within the SPD area

Responding to Key Issues and Concerns

Sandwell MBC planning officers reviewed the 59 representations received on the Draft SPD prior to considering any potential amendments to the document. A number of representations were omitted due to being either irrelevant or unsound prior to the document being amended to take account of and address the issues that had been raised through consultation.

List of Consultees

In accordance with legislation and guidance the four Consultation Bodies were consulted. In addition a selection of relevant specific consultees (as listed in PPS12 and the SCI) were consulted as well as local organisations, groups, residents and business as suggested in the SCI. This list can be found in Appendix 2 to this Consultation Statement.
Schedule of Representations

A schedule of all the representations received has been produced in accordance with Reg. 18(4)(b) of the Town and Country Planning (Local Development) (England) Regulations 2004. This Schedule of Representations can be found in Appendix 3 to this Consultation Statement.

The Schedule of Representations is presented firstly with those representations made regarding a specific section of the Draft SPD, in order of its contents, e.g., representations made to Section One are noted first. Following the specific section based representations, the public representations are presented along with non-specific representations and those who declined to submit representations.
Appendix 1: Legal Notices
PLANNING AND COMPULSORY PURCHASE ACT 2004
Town and Country Planning (Local Development) (England) Regulations 2004

Notice of Deposit for the Draft Brades Village Supplementary Planning Document

THE BOROUGH OF COUNCIL OF SANDWELL

DRAFT BRADES VILLAGE SUPPLEMENTARY PLANNING DOCUMENT

The Borough Council of Sandwell has prepared proposals for the Draft Brades Village Supplementary Planning Document. The Brades Village area is considered to be of significant importance as there is the potential for a comprehensive residential scheme, which would deliver a new sustainable community and would perform a key role in addressing the Borough's housing targets.

The Draft Supplementary Planning Document aims to provide a co-ordinated solution that will address a number of issues facing the area and deliver a comprehensive scheme. This document will be used as a material consideration in negotiations regarding proposals and the determination of planning applications on sites within the Draft Brades Village Supplementary Planning Document area.

Copies of the Draft Brades Village Supplementary Planning Document are available for public inspection free of charge during normal office hours (Monday to Thursday 8.00 am-5.30 pm and Friday 8.00 am-5.00 pm) from 17 July to 28 August 2006 at the following offices:

(a) Sandwell Council House, Oldbury, West Midlands B69 3DE;
(b) the offices of the Director of Planning and Transportation, Development House, Lombard Street, West Bromwich, West Midlands B70 8RU; and
(c) Oldbury Library, Church Street, Oldbury B69 3AF.

On Wednesday 19th July 2006 between the hours of 4-7 pm, planning officers will be present for discussions and to take enquiries at Tividale Community Centre, Lower City Road, Oldbury, West Midlands B69 3HA.

Comments in respect of the Draft Brades Village Supplementary Planning Document, should be sent in writing to:

The Director of Planning and Transportation, Development House, Lombard Street, West Bromwich, West Midlands B70 8RU to reach the Director of Planning and Transportation no later than 28 August 2006.

Comments should specify the matters to which they relate and the grounds on which they are made. They may also be accompanied by a request to be notified at a specified address of the withdrawal, adoption, approval or rejection of the Supplementary Planning Document.

Only those whose comments are made in writing and arrive at the address specified within the six week period ending on 28th August will have a right to have their comments considered by the Council. Comments received within the consultation period will be collated and responded to prior to the document being adopted as a Supplementary Planning Document, in line with the Town and Country Planning (Local Development) (England) Regulations 2004.

Further information is available from the Planning helpline (0121 569 4122) at the offices of the Director of Planning and Transportation, Development House, Lombard Street, West Bromwich, West Midlands B70 8RU.

Robert Lee
Director of Planning and Transportation
PLANNING AND COMPULSORY PURCHASE ACT 2004

Town and Country Planning (Local Development) (England) Regulations 2004

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(a) Sandwell Council House, Oldbury, West Midlands, B69 3OE;

(b) the offices of the Director of Planning and Transportation, Development House, Lombard Street, West Bromwich, West Midlands, B70 8RU;

(c) Oldbury Library, Church Street, Oldbury, B69 3AF.

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Robert Lee
Director of Planning and Transportation
Appendix 2: List of Consultees
Planning Policy Co-ordinator  
Advantage West Midlands  
3 Priestley Wharf  
Holt Street  
Aston Science Park  
Birmingham  
B7 4BN  

Mark McGuinness  
Barratt  
Trinity Point  
New Road  
Halesowen  
B63 3HY

Black Country Chamber & Business Link  
Dudley Court South  
Waterfront East  
Brierley Hill  
DY5 1XN  

Birmingham City Council  
Development Planning Division  
Alpha Tower  
Birmingham  
B1 1TU

Black Country Groundwork Trust  
Groundwork Environmental Centre  
Doulton Way  
Tipton  
DY4 9AL  

British Gas  
House Contact Centre  
PO Box 50  
Leeds  
LS1 1LE

Mr A. Spencer  
British Waterways  
Peels Wharf  
Fazeley  
Tamworth  
Staffordshire  
B78 3QZ  

Lisa Canning  
Canning Associates  
The Garden House  
Abberley Village  
Worcester  
WR6 6BN

Confederation of British Industry  
4th Floor  
1 Hagley Road  
Edgbaston  
Birmingham  
B16 8TG  

Peter Brown  
Centro  
Centro House  
16 Summer Lane  
Birmingham  
B19 3SD

Richard Hickman  
Countrywide Homes Ltd  
Norwich House  
45 Poplar Raod  
Solihull  
B91 3AW  

Crown Estate Commissioners  
Crown Estate Office  
13-15 Carlton House Terrace  
London  
SW1Y 5AH

Mr John Lindley  
Cycling in Sandwell  
Kinston House  
438 High Street  
West Bromwich  
B70 9LD  

Department of Trade & Industry  
Convention House  
Paradise Circus  
Queensway  
Birmingham
Matthew Williams
Drivers Jonas
Somerset House
37 Temple Street
Birmingham
B2 5DP

Jenny Jones
English Partnerships
Jordan House West
Hall Court
Hall Park Way
Telford
TF3 4NN

Sue Griffin
Government Office for the West Midlands
5 St. Philip's Place
Colmore Row
Birmingham
B3 2PW

Liz Davis
The Highways Agency
C2/04, 5 Broadway
Broad Street
Birmingham
B15 1BL

Mrs S. Ralph
John's Lane Residents & Community Group
2 Atlee Close
Tividale
Oldbury
B69 3JF

Linda Warner
The Meadows School
Dudley Road East
Oldbury
B69 3BU

Land and Development Manager
National Grid Company PLC
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Martin Dando
Dudley Metropolitan Borough Council
Environment, Engineering & Transport Department
Council House
Mary Stevens Park
Stourbridge
DY8 2AA

Ian Jones
George Wimpey Midland Ltd
Chase House
Park Plaza
Heath Hayes
Cannock
WS12 2DD

C. R. Eaton
Health and Safety Executive
Chemical and Hazardous Installations Division
McLaren Building
Masshouse Circus
Birmingham
B4 7NP

Home Builders Federation
First Floor
Oakfield House
Small Heath Business Park
Talbot Way
Birmingham
B10 0HJ

Landcom Holdings Plc
17 Clifford Street
Mayfair
London
W1S 3RQ

Morris Homes
Delta House
Pendeford Business Park
Wolverhampton
WV9 5HA

Mr D Earley
National Playing Fields Association
NPFA Fields Office
Midland Sports Centre
Cromwell Lane, Tile Hill
Coventry
CV4 8AS
National Urban Forestry Unit
The Science Park
Stafford Road
Wolverhampton
WV10 9RT

Nigel Judge
Network Rail
Bristol and Easter House
Lower Approach Road
Temple Meads
Bristol
BS1 6QF

Oldbury and Smethwick Primary Care Trust
Kingston House
438 High Street
West Bromwich
B70 9LD

David Bourne
Oldbury Traders Association
Savacentre Ltd
Freeth Street
Oldbury
B69 3DB

Angela Lamont
Oldbury Town Team
Oldbury Fire Station
Old Park Lane
Oldbury
B69 4PU

John Stackhouse
Persimmon Homes
Venture Court
Broadlands
Wolverhampton
WV10 6TB

Tom Dutton
Rhodia UK Limited
PO Box 80
Trinity Street
Oldbury
B69 4LN

John Dawson
Rounds Green Community Association
100 Ashtree Road
Oldbury
B69 2DU

Mr M. Murphy
Rounds Green Primary School
Brades Road
Oldbury
B69 2DP

Pete Dalley
Sandwell Cycle Speedway Club
22 Mariot Road
Netherton
DY2 0JX

Delors Medina
Sandwell Community Empowerment Network
128b Oldbury Road
Smethwick
B66 1JE

Mr A. Farrington
Sandwell Community Empowerment Network
71 Theodore Close
Oldbury
B69 3EF

John Middleton
Sandwell Health Authority
Director of Public Health
PO Box 153
Lewisham Street
West Bromwich
B71 4NA

Councillor Babu Singh Bawa, OBE
Sandwell MBC
4 Richmond Hill
Oldbury
B68 9TJ
Wellman Robey Limited
Newfield Road
Oldbury
B69 3ET

David R. Carter
Beswick Paper Ltd
10 Dudley Road
Oldbury
B69 3DN

BC Barton and Son Ltd
PO Box 67
1 Hainge Road
Tividale
Oldbury
B69 2NJ

Mr Alan Walker
35 Brades Rise
Oldbury
B69 2HG

Andrew Canning-Trigg
Countryside Agency
West Midland Region
1st Floor, Vincent House
Quay Place
92-93 Edward Street
Birmingham
B1 2RA

Amanda Smith
English Heritage
Attingham Park
Shrewsbury
Shropshire
SW4 4TW

Graham Walker
English Nature
West Midlands Region
Attingham Park
Shrewsbury
Shropshire
SY4 4TW

Marion Hinton
The Environment Agency
Upper Trent Area Office
Sentinel House
9 Wellington Crescent
Fradley Park
Lichfield
WS13 8RR
Appendix 3: Schedule of Representations
<table>
<thead>
<tr>
<th>Section of the SPD</th>
<th>Name</th>
<th>Organisation</th>
<th>Representation</th>
<th>Council Response</th>
<th>Amendment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Introduction</td>
<td>Police Constable Steven Chilton</td>
<td>West Midlands Police</td>
<td>Objectives 1.7: This Section should include Safety and Security - to ensure a better quality of life requires robust rebuttal of crime generation features. Sustainability is not just about energy use. Sustainable communities are ones, which do not suffer high levels of crime. The designing out of crime and the creation of safer places should be a principal objective of the Brades Village SPG.</td>
<td>Amend objective to include reference to safety and security.</td>
<td>Providing a distinctive, high quality, connected, safe and secure, sustainable …</td>
</tr>
<tr>
<td></td>
<td>Matthew Williams</td>
<td>Drivers Jonas</td>
<td>Paragraph 1.3: The words Local Development Framework should be inserted into the text as follows ‘As the Sandwell UDP was adopted in 2004, it is considered to be up-to-date. Therefore, the Council intend to save all the policies for at least three years, until 2007, while the new Local Development Framework is being prepared.’ Paragraph 1.4: The current wording is too onerous and inflexible as it states that the Brades Village area should be brought forward through the co-ordinated delivery of comprehensive development. While this is an objective of the Council, the wording of the SPD fails to take account of the existing separate housing allocations, which should form the basis for the SPD as set out in Paragraph 2.43 of PPS12. The SPD should be used to expand upon/clarify adopted (in this case saved) policies. The sites are allocated individually within the UDP and are capable of being brought forward in isolation. The SPD can legitimately provide a basis for seeking co-ordinated design policies and other principles to be applied to development but should not require comprehensive development only. We would therefore suggest that this paragraph be reworded as follows: ‘The Brades Village area was identified as a key area of opportunity and change, due to the localised intensity of UDP housing allocations. The need was established for the preparation of an Area Action Plan (AAP) through the Oldbury Town Planning Statement in order to provide guidance which seeks to deliver co-ordinated development, which incorporates the following UDP (2004) housing allocations within the area: • Ho74: Former Accles and Pollock Sports Ground; • Ho171: Lower City Road • Ho173: Summerton Road Paragraph 1.5: The timescales for the production of the SPD should be set out in full here. This is an important piece of information, which would be helpful to have clearly set out within this document. Also, if it is no longer the intention to progress an AAP for Brades Village then the SPD should identify this. As a matter of approach, an AAP would be the proper vehicle for promoting the comprehensive approach to development envisaged in the draft SPD. Paragraph 1.7: Given the comments made in respect of Paragraph 1.5 we would request that this paragraph be re-worded to allow a greater degree of flexibility in bringing the development of the Brades Village SPD area forward. ‘The Brades Village SPD will provide additional guidance for the area to assist in the Council’s aspiration to seek a co-ordinated approach to development of the area. Paragraph 1.8: The word housing should be inserted into the text as follows ‘The scale of envisaged development within the SPD area is of strategic importance as it has the potential to address local need and demand for housing as well as making a significant contribution towards the Borough’s housing targets, by means of a substantial, integrated extension to the existing community.’ Paragraph 1.10: The current wording should be amended to read ‘The SPD provides guidance to assist in the co-ordinated delivery of development in the area, incorporating these proposal sites.’</td>
<td>Amend as suggested.</td>
<td>Not in agreement with suggested amendment, though a slight amendment is required.</td>
</tr>
<tr>
<td>Christopher Parry</td>
<td>Birmingham and Black Country Wildlife Trust</td>
<td>Section 1: Introduction</td>
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<td>Paras 1.8-1.10 explain the status and the role of the plan. Para 1.9 says that SPD documents cannot allocate land. In our view, this draft SPD does this – see plans 3 and 4 – in allocating specific land uses to specific areas of land within the SPD boundary. Also Chapter 6, Para 6.4 identifies a potential land swap, which would effectively re-allocate land use on two sites. Given our comments in 1.1 above, the draft SPD as currently prepared also appears to take an Area Action Plan form. The SPD appears to meet several of the criteria used to establish the need for AAPs, as presented in PPS12 (paras 2.17-2.19). The resultant draft Brades Village SPD appears to be a hybrid AAP – SPD document.</td>
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<thead>
<tr>
<th>Maggie Taylor</th>
<th>Sport England</th>
<th>Representation: Section - 1.7</th>
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<tr>
<td></td>
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<td>Welcome reference to high quality design, sustainable communities in which to enjoy recreation, improved connectivity and the provision of public open space in the objectives. It is important to recognise the need to ensure the design and provision of facilities within redevelopment areas provide a holistic community environment. Sport England are keen to ensure such proposals provide open space, sport and recreation land/facilities within or accessible to such communities to ensure PPG17 is delivered and fulfil the requirements of PPS1 to provide opportunities for physical activity. In general, and more particularly in deprived areas, it is necessary to improve the opportunities for physical activity to reduce obesity and improve health and well being. This can be achieved through better linkages/provision of walking, cycling and play environments as well as formal indoor and outdoor sports facilities. The objectives should ensure that any proposals realise how design, layout, public open space and community sports facilities helps to meet these aspirations.</td>
</tr>
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<thead>
<tr>
<th>Laura Hackwood</th>
<th>Environment Agency</th>
<th>Introduction</th>
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<tbody>
<tr>
<td></td>
<td>The Agency very much supports the Objectives within Section 1 and are pleased to see that the plan proposes preservation and enhancement of the natural environment.</td>
<td></td>
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</tbody>
</table>

| Amanda Smith | English Heritage | With respect to the draft document we welcome the clear references to the historic environment as part of the document’s objectives and vision. |

<table>
<thead>
<tr>
<th>Graham Walker</th>
<th>English Nature</th>
<th>English Nature generally welcomes the document, particularly the recognition given to the need to maintain and enhance the natural environment and greenspace network and, as a consequence, we support the objectives of:</th>
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<tr>
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<td>• “providing sufficient, quality, accessible public open space and a network of interconnected green spaces for all users that meet the needs of the community”; and</td>
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<tr>
<td></td>
<td></td>
<td>• “conserving, preserving and enhancing the natural, built and historic environments, whilst minimising environmental effects”.</td>
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<thead>
<tr>
<th>2. Vision</th>
<th>Police Constable Steven Chilton</th>
<th>Vision</th>
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<tr>
<td></td>
<td>2.2: This paragraph should highlight the need for security and safety. Inclusive design must mean that all sections of the community have equal rights to acceptable security. Private sale dwellings should reach Secured by Design as well as the affordable element.</td>
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<td></td>
<td>2.3: Sustainable design. The design must include crime resistance; brown field sites such as the one proposed must take the opportunity to improve crime resistance and enhance community safety. Crime and the cost of crime to the community are to be specifically avoided.</td>
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</table>

| No amendment. | The SPD does not allocate land as stated in para. 5.2 but merely identifies how additional land could be utilised to compliment development and create a co-ordinated environment. |

| No amendment. | No amendment. |

| No amendment. | No amendment. |

| No amendment. | No amendment. |

| No amendment. | Amend para. |

| Create bullet point with reference to community safety.
<table>
<thead>
<tr>
<th>Name</th>
<th>Organization/Interest</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Matthew Williams</td>
<td>Drivers Jonas</td>
<td>Amend as suggested.</td>
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<td></td>
<td>Paragraph 2.3: The wording needs to be changed as follows</td>
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<td>‘In order to achieve this vision the <strong>SPD</strong> must consider and promote.’</td>
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<td>Paragraph 2.4: The paragraph needs rewording to state</td>
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<td>‘Most importantly the proposals of the <strong>SPD</strong> must be deliverable. As stressed throughout the document the objective is to deliver development in the SPD area that provides a coordinated solution. ’</td>
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<td></td>
<td>Paragraph 2.5: A number of text inserts and wordings are suggested as follows</td>
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<td></td>
<td>Bullet Point 1:</td>
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<td>‘The development of housing proposal sites allocated in the UDP as part of a coordinated approach, with the incorporation of additional sites for housing.’</td>
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<td>Bullet Point 3:</td>
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<td>‘Exploration of the potential for an exchange of Council owned land, currently in use as Tividale Community Recreational Centre (to be made available for additional, supplementary housing) with the Gower Tip site immediately adjoining to the east. Subject to further environmental tests, the Gower Tip site could be appropriate for a range of development options, including residential development or the relocation of sports facilities and public open space in the area.’</td>
<td></td>
</tr>
<tr>
<td>Christopher Parry</td>
<td>Birmingham and Black Country Wildlife Trust</td>
<td>No amendment.  This point is already covered in para. 2.3 “the preservation and enhancement of the natural and historic environments”.</td>
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<td>Chapter 2: Vision</td>
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<tr>
<td></td>
<td>The Trust is disappointed that the Vision in the draft fails to use as a base the Black Country Vision, which has been used as the foundation for the work relating to the Black Country Study and Draft RSS Phase 1 Revision. We are also disappointed that there is little detail about the importance of environmental quality, both broadly and in terms of the natural and historic environment. Environmental quality should be at the heart of Black Country (and Sandwell) regeneration and play a critical role in raising peoples' quality of life – these issues are touched on later in the document in Para 5.12 – we think they need a much higher profile. We find that parts of this chapter are not really about vision but more about delivery, land allocation and land assembly.</td>
<td></td>
</tr>
<tr>
<td>Maggie Taylor</td>
<td>Sport England</td>
<td>Amend. Create bullet point.</td>
</tr>
<tr>
<td></td>
<td>Representation: Section - 2.2 - 2.3</td>
<td>No amendment.  The provision of open space, green links and recreational opportunities.</td>
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<td></td>
<td>As set out in the comments on 1.7 it is good that the vision recognises the importance of sustainable design/communities/travel and the need for community facilities and open space. The connection however, would be improved if the improvement of health through increased physical activity was within the text.</td>
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<td></td>
<td>Representation: Section - 2.5</td>
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<td></td>
<td>As Sport England have some concerns about the loss of Tividale Community Recreational Centre. Whilst relocation of sports facilities and additional public open space are mentioned it should be stressed that any development proposals will need to fully demonstrate that the provision of PPG17 are met in that the replacement facilities are better in terms of quantity, quality and accessibility (in that they need to meet the needs of existing and new communities). Any proposals will need to ensure they fully reflect the strategies set out in Sandwell's Playing Pitch Strategy, Sports Strategy and demand for facilities as identified through assessment using the Active Places Database and Sports Facility Calculator (these are strategic planning tools to enable assessment of supply and demand of key sports facilities which should inform development such as this). We have trained colleagues of yours in using these tools and will happily explain and help you understand their relevance to the SPD. You can however view them on <a href="http://www.sportengland.org/planningkitbag">www.sportengland.org/planningkitbag</a> (<a href="http://www.sportengland.org/planningkitbag">http://www.sportengland.org/planningkitbag</a>) and <a href="http://www.activeplacespower.com">www.activeplacespower.com</a> (<a href="http://www.activeplacespower.com">http://www.activeplacespower.com</a>).</td>
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<td></td>
<td>Sport England suggests that the SPD should require any development proposals to support their sport and recreation plans by referring to the Councils PPG17 assessments and reviewing provision using Active Places Power and the Sports Facility Calculator. The latter will calculate how much demand is generated from the new population for swimming pools, sports halls, indoor bowls (and soon STPs) and price up the cost of provision. It is really useful for calculating S106 contributions.</td>
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<tr>
<td>Laura Hackwood</td>
<td>Environment Agency</td>
<td>No amendment.</td>
</tr>
<tr>
<td></td>
<td>Vision</td>
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<td></td>
<td>The Agency supports the Vision in Section 2.</td>
<td></td>
</tr>
<tr>
<td>Amanda Smith</td>
<td>English Heritage</td>
<td>No amendment.</td>
</tr>
<tr>
<td></td>
<td>With respect to the draft document we welcome the clear references to the historic environment as part of the document’s vision,</td>
<td></td>
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<tr>
<td>3. Policy Context</td>
<td>Police Constable Steven Chilton</td>
<td>West Midlands Police</td>
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<tr>
<td>Joanne Ellis</td>
<td>Environmental Health and Trading Standards: SMBC</td>
<td>Section 3.12</td>
</tr>
<tr>
<td>Matthew Williams</td>
<td>Drivers Jonas</td>
<td>Paragraph 3.19</td>
</tr>
<tr>
<td>Richard Booth</td>
<td>Centro</td>
<td>Section 3 - Policy Context</td>
</tr>
<tr>
<td>Maggie Taylor</td>
<td>Sport England</td>
<td>Representation: Section - 3.11</td>
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<tr>
<td>The last sentence should refer to sport and recreation as well and open space and also to the Councils related PPG17 assessments. If the Council have not undertaken an assessment (e.g. for green spaces or indoor sports (a Playing Pitch Strategy is being prepared now) then a developer will be expected to undertake the assessment in the catchment of the area and gain the support of the community for it.</td>
<td>Amend as suggested.</td>
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<tr>
<td>Representation: Section - 3.15</td>
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<td>This section refers to RPG11 policies being set out in Appendix 3 - there is no such appendix in the document. Why does this section not refer to the Regional Spatial Strategy - I think it should.</td>
<td>Amend reference to Appendix 3. RPG11 is the RSS</td>
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<td>Representation: Section - 3.16</td>
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<td>Is specific mention of the Urban Park concept relevant here given the focus on open space, green linkages and high quality environments?</td>
<td>No amendment.</td>
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<tr>
<td>Representation: Section - 3.17</td>
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<tr>
<td>There is no reference to Sandwell's Community Strategy (unless this is what is referred to as 'The Sandwell Plan (2004)' or Cultural Strategy. These are key documents which documents such as this should be aligned to.</td>
<td>Amend to emphasise that Sandwell Plan is the Sandwell Community Strategy</td>
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<tr>
<td>Representation: Section - 3.17</td>
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<tr>
<td>As open space, sport and recreation appear to be a key driver to the SPD UDP polices OS2, 5, 6, 7, 8, 9, 11, 12 and 15 should be included in the bullet points.</td>
<td>No amendment as a list of relevant UDP policies is provided in Appendix 1.</td>
<td></td>
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</table>

The Sandwell Plan (2004), which is the Community Strategy for Sandwell …
SFRA is a requirement outlined in the forthcoming Planning Policy Statement 25: Development and Flood Risk (PPS25), which is due to be adopted by the DCLG in October 2006. SFRA is a strategic document, which Local Planning Authorities in England and Wales are expected to produce to inform their new LDF documents. SFRA takes a strategic look at flood risk within a LPA area. All Development Plan Documents produced by a LPA should be informed by SFRA to ensure that plans, programmes, allocations etc are sustainable from a flood risk viewpoint.

The SFRA will form an evidence base regarding flood risk. Only with this document can we comment as to the sustainability of your LDF documents. We would be happy to discuss this matter further with your Local Authority and offer advice where required. Upon completion of a suitable SFRA, the Agency may be in a position to review its stance and would then comment as follows:

**Policy Context**

PPS23: Planning and Pollution Control: We are pleased to see the inclusion of PPS23 within the national policy of Section 3. PPS23 adopts the precautionary principle in relation to development plans and in this regard desk studies will need to be undertaken prior to the determination of planning applications.

PPG25: Development and Flood Risk: In addition to our comments regarding the need to undertake a SFRA, although the Agency are pleased to see the incorporation of PPG25, we also consider that the forthcoming PPS25 should be included as this is likely to be adopted (Autumn 2006) before the Brades Village SPD and as such will be a document relevant to consideration.

As well as advising against placing new development in flood risk locations, PPG and the Draft PPS25 also make reference to the need to reduce surface water run-off and for the incorporation of sustainable drainage systems (SUDS).

The guidance stipulates that flood issues are not just associated with rivers and coastal, flooding can be generated by surface water run-off from urbanisation by increasing the extent of impermeable ground. In addition the guidance strongly endorses the early consideration of SUDS at all levels of the planning and development process and states that suds can be implemented at all scales.

**The Water Framework Directive**

Considering the poor water quality within the delineated and surrounding area we consider that The Water Framework Directive (WFD) should also be included within Section 3. The WFD is the most substantial piece of EC water legislation to date. It requires all inland and coastal waters to reach “good status” by 2015. It will do this by establishing a river basin district structure within which demanding environmental objectives will be set, including ecological targets for surface waters. The full text of the Directive can be found on the Europa website at: [http://europa.eu.int/comm/environment/water/water-framework/index_en.html](http://europa.eu.int/comm/environment/water/water-framework/index_en.html)
<table>
<thead>
<tr>
<th>Christopher Parry</th>
<th>Birmingham and Black Country Wildlife Trust</th>
<th>Chapter 3: Policy Context</th>
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</thead>
<tbody>
<tr>
<td>It is right that the content of the SPD must be aligned with, and influenced and informed by, other guidance and strategies, in order to demonstrate the joined-up thinking of the Council and to make the most of policy and implementation linkages. However, the Trust has the view that this document needs to articulate more clearly guidance and advice from government, other environmental strategies and evidence from the national, regional, sub-regional and local policy base available to Sandwell Council, as well as legislative requirements. Examples are provided below:</td>
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<td>National:</td>
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<td>• National Environment and Rural Communities Act 2006</td>
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<td>• Countryside and Rights of Way Act 2000</td>
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<td>• PPS9: Biodiversity and Geological Conservation</td>
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<td>• Circular 06/2005 Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System, ODPM</td>
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<td>• Working with the Grain of Nature, the England Biodiversity Strategy, DEFRA</td>
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<td>• Natural Partners, England Biodiversity Group, DEFRA</td>
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<td>• Life-Support, incorporating Biodiversity into Community Strategies, ODPM</td>
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<td>• Providing Accessible Natural Greenspace in Towns and Cities, English Nature</td>
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<td>• Natural Communities</td>
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<td>Regional:</td>
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<td>• West Midlands Regional Spatial Strategy, in particular the Quality of Environment policies, and especially those relating to Biodiversity Enhancement Areas, WMRA</td>
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<td>• Restoring the Region’s Wildlife Regional Biodiversity Strategy for the West Midlands, WMRA</td>
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<td>• Beyond the Wish List A Toolkit for Integrating Biodiversity into Community Strategies in the West Midlands Region, West Midlands Biodiversity Partnership</td>
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<td>Sub-Regional:</td>
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<td>• The draft RSS Phase One Revision: the Black Country WMRA</td>
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<td>• The Black Country Study, Black Country Consortium</td>
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<td>• Quality of Place Environment Technical Report, Black Country Consortium</td>
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<tr>
<td>• Birmingham and Black Country Biodiversity Action Plan (B&amp;BCBAP), Birmingham and Black Country Biodiversity Partnership</td>
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<tr>
<td>• Black Country Geodiversity Action Plan (BCGAP), Black Country Geodiversity Partnership</td>
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<tr>
<td>• The Endless Village Re-visited Technical Background Report, Birmingham and Black Country Wildlife Trust</td>
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<tr>
<td>The NERC Act 2006 is especially important because it establishes a new duty for all public bodies to conserve biodiversity in carrying out their proper functions. The preparation and adoption of new planning documents provide an opportunity for local authorities, as public bodies, to demonstrate this.</td>
<td></td>
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<tr>
<td>4. The Brades Village Context</td>
<td>Richard Booth</td>
<td>Centro</td>
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<tr>
<td>Section 4.7</td>
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<td>This paragraph should highlight that current bus service provision exists on New Birmingham Road, Brades Road and Dudley Road East. It is important that direct well maintained linkages are made to these bus services from the development area.</td>
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<tr>
<td>Amend para. on PPS9 to include greater emphasis on biodiversity.</td>
<td>Amend para. to include suggested information.</td>
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</table>
The whole of the borough has been declared an Air Quality Management Area (AQMA) due to a number of areas within the borough that exceeded the national air quality objective for annual mean nitrogen dioxide (NO₂). The section of Dudley Road East that passes through the SPD area is one of the areas that exceeds the NO₂ objective. SMBC are currently in the process of preparing an Air Quality Action Plan to show how we intend to improve air quality in these areas. It may be helpful to include this background information regarding air quality.

It is important to consider the cumulative impact of such proposals on local air quality (as stated in PPS23). Should all the development in the SPD go ahead it would have a significant impact on traffic on surrounding roads, increasing traffic on Dudley Road East would be a particular for air quality. Although the cumulative impact would be significant the impact of each individual application is not likely to be significant so it would be difficult to assess this at application stage. Therefore, it is important that the cumulative impact is assessed prior to the SPD being finalised. This would also enable any mitigation measures to be included.

The existing high levels of NO₂ along Dudley Road East will mean that if residential properties are located too close to the road they will exceed the national air quality objective. Therefore, I recommend that a minimum buffer zone between the road and any development is agreed and included in the SPD. The extent of the buffer zone required will depend on the cumulative impact of the development, so an assessment of the cumulative impact should be carried out prior to setting the buffer zone.

Section 4 makes no reference to the Birmingham Canal, which runs through the delineated area. An additional point should be added under ‘Land uses and the Built Environment’ stating the following:

- water feature, the Birmingham Canal, which runs north west to south east.

The Birmingham Canal should also be seen as a strong advantage for regeneration and therefore we recommend the ‘Advantages’ should be reworded as follows:

- The area provides significant development opportunities i.e. canal side redevelopment.

This paragraph outlines that the potential residential development within the SPD area will create an additional need for community/public open space provision.

In order to support this statement, the SPD should set out additional explanation of the scale and nature of any deficiencies arising from further residential development based on a proper assessment of existing facilities. Also, should improvements in provision be required, it may be more appropriate to enhance and improve existing facilities (i.e. Tividale Community Recreational Centre and associated open space) rather than provide additional provision elsewhere.

In our view, the draft SPD provides limited information about the environmental context of the area. We think that more environmental context could be provided, particularly in relation to biodiversity, geodiversity and the historic environment. We welcome the identification of the nature conservation importance of the Gower Branch Canal. The Birmingham Canal is also of nature conservation importance, coming with the definition of Article X of the Habitats Directive and Regulation 37 of the Habitats Regulations, both of which relate to “linear features of the landscape”.

There are other areas within the SPD boundary that may harbour biodiversity interest, one of these being the Gower Tip site where a significant area of semi-natural habitat exists and where Priority Habitats may be found. There may also be protected species, Biodiversity Action Plan species and Species of Conservation Concern within the SPD area or its environs; for example, water voles are known to inhabit the Gower Branch Canal. Likewise, there may be geodiversity features or historic environment features. In the nature of Good Practice, we recommend that the SPD attempts to identify potential features and their importance, either in a map-based format and/or within the text. How well potential features are protected, managed and enhanced would be an issue for future delivery and implementation processes within the SPD.

Amend to include reference to air quality in new para. entitled natural environment.

Amend to include reference to air quality in planning obligations and conditions.

Include as a condition in Section 6.6.

Amend as suggested.

Amend as suggested.

Amend to include supporting information in the form of UDP policy and forthcoming Intensification SPD.

Amend to include reference to sites recognised and allocated as areas of nature interest (UDP) within para. entitled natural environment.
<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
<th>Comments</th>
<th>Amendment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maggie Taylor</td>
<td>Sport England</td>
<td>Representation: Section - 4.3 - 4.6 Comments - see comments on 2.5 above</td>
<td>No amendment.</td>
</tr>
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<td></td>
<td></td>
<td>Representation: Section - 4.9 - 4.11 Comments - see comments on 2.5 above</td>
<td>No amendment.</td>
</tr>
<tr>
<td>Kevin Harvey</td>
<td>Highways Agency</td>
<td>The proposed scheme is located close to M5 J2 and is adjacent to the A4123, which both form part of the strategic road network (SRN) maintained and operated by the HA. The Draft SPD identifies key transport links between Brades Village and the rest of the Borough. However, it does not include any reference to the M5 Motorway, a route of strategic national importance, or the A4123.</td>
<td>Amend to include suggested information.</td>
</tr>
<tr>
<td>Police Constable</td>
<td>West Midlands</td>
<td>The document makes no reference to Secured by Design – crime is an adverse impact. Secured by Design compliance is proven to reduce crime.</td>
<td>Amend to include reference to term.</td>
</tr>
<tr>
<td>Steven Chilton</td>
<td>Police</td>
<td></td>
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<tr>
<td>John M’Ilroy</td>
<td>Transport Policy: SMBC</td>
<td>The next to last bullet point in paragraph 5.7 refers to aspirational housing. What is meant by this? Also, why is it linked to locating in areas of lower density? Surely an aspirational house might be a penthouse canalside apartment with roof terrace, just as much as a 4 bedroom, 3 bathroom, double garaged detached.</td>
<td>Remove term.</td>
</tr>
<tr>
<td>Joanne Ellis</td>
<td>Environmental Health and Trading Standards: SMBC</td>
<td>Section 5.11 There is no mention of public transport. One of the main mitigation measures to improve air quality in the area will be to improve public transport. Is it possible to include any improvements in the public transport in this area as part of the SPD?</td>
<td>Amend to include improvements to public transport in para. 6.5 Planning Obligations.</td>
</tr>
<tr>
<td>Laura Hackwood</td>
<td>Environment Agency</td>
<td>Under Section 5.12 ‘The Environment’, the Agency considers the following should be added:</td>
<td>Amend to include reference as suggested.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• The incorporation of sustainable drainage systems, which will improve surface water run-off rates, water quality and also offer amenity value and therefore enhance the quality of the local and surrounding environment. None provision of the use of SUDS must be fully justified.</td>
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</tr>
<tr>
<td>Andrew Piatt</td>
<td>Morris Homes</td>
<td>Section 5: Development Strategy and Principles Morris Homes supports the redevelopment for residential purposes within Brades Village. However, Section 5.1 should make it clear that applications on individual parts of Brades Village can be brought forward independently. There is no need for concurrent development across the whole area. All that each individual application needs to address are the links between it and other parts of the development. Such are capable of being dealt with at reserved matters stage.</td>
<td>No amendment. It was recognised that further guidance was required in order to provide direction for a co-ordinated approach.</td>
</tr>
<tr>
<td>Graham Walker</td>
<td>English Nature</td>
<td>Our only other comment is that we would like to see reference made to the importance of ensuring that the design of open space and green links maximises their value for biodiversity through, for example, the use of native species and the inclusion of semi-natural habitats that can be sustainably managed. This does not necessarily mean that open spaces are entirely devoted to biodiversity but, through careful design, biodiversity can be an integral part of the open space/green space network. Reference to biodiversity could be achieved by adding the following sentence to the first bullet point in Section 5.12 The Environment: “The design of public open space and green links will be expected to incorporate biodiversity as an integral part of the open space/green space network through, for example, the use of native species and the inclusion of semi-natural habitats that can be sustainably managed”.</td>
<td>Amend Open Space and Green Links to include reference to biodiversity.</td>
</tr>
</tbody>
</table>
| Paragraph 5.1 | The following rewording of this paragraph is suggested:

The purpose of this SPD is to provide guidance for a co-ordinated approach to development in the area. This will assist in discouraging the development of existing proposal sites within the SPD area without considering the design and other principles identified, which could have the potential to lead to piecemeal development. Without an overall vision to work towards, development could subsequently lead to individual housing sites that do not form a new community, are not linked, do not relate, do not connect and improve links nor make the best of existing development opportunities.’|

| Paragraph 5.4 | Insert the following to the text:

‘The guidance provided by this SPD has been translated into broad, indicative concept plans, to provide the basis against which more detailed master planning work can be undertaken by the development industry to inform the submission of planning applications.’|

| Paragraph 5.6 | Reword first bullet point to remove rigid figure and allow for greater flexibility:

‘There is potential for the site to be developed at an average residential density of approximately 50 dwellings per hectare (dph).’|

| Paragraph 5.7 | We would question the reasoning behind bullet point seven. It is unclear what is meant by aspirational housing and why such housing should be restricted to areas of lower density.

Paragraph 5.10

Bullet point two mentions how there is an identified scope for the provision of leisure uses and community facilities in place of those set aside for housing. As an alternative, it may be more desirable, particularly from a land assembly and developer perspective, to keep the existing recreation/leisure uses and enhance and improve these where necessary to meet the needs of the future residents of the Brades Village SPD area.

We suggest an additional bullet point for inclusion in this paragraph:

‘As an alternative option, consideration should be given to enhancing and improving existing leisure/recreation provision at Tividale Community Recreational Centre and allowing the Gower Tip site to be brought forward for residential development.’|

| Paragraph 5.12 | This paragraph discusses the land exchange of the Gower Tip site and the Tividale Community Recreational Centre, providing the Gower tip site can be decontaminated.

Our Client is keen to secure the development of their current land holding at Brades Village. In order to realise this aspiration, greater flexibility is required in bringing forward possible options for the Gower Tip site, particularly given existing constraints arising from the past use.

For the purposes of the SPD, as with comments to para. 5.10, it is more appropriate to promote open space on area 4 as just one possible option.

The following rewording of bullet points is suggested:

First Bullet Point:

‘As a potential alternative for retaining and enhancing open space provision at the Tividale Community Recreational Centre, the provision of high quality public open space on the Gower Tip site, supplemented by green links spanning across the site, will exceed the minimum requirements of 2ha per 1000 population stipulated in Policy OS5: Community Open Space, will enhance the quality of the environment and assist in the improvement of quality of life.’

Third Bullet Point:

‘The Gower Tip site has been identified as a possible target site for additional public open space within the SPD area. However, this option is dependent on whether the site can be decontaminated to appropriate levels.’|
Christopher Parry  Birmingham and Black Country Wildlife Trust  

Chapter 5: Development Strategy and Principles

This SPD offers considerable potential to encourage and deliver sustainability benefits as the regeneration of Brades Village takes place. This chapter could identify a broad range of strategies and principles, particularly the degree to which development within the SPD area could contribute to raising environmental standards in respect of for example:

- Energy provision (eg. renewables) and energy efficiency
- Waste management
- Sustainable drainage
- Construction standards eg. BREEAM EcoHomes
- Open space / biodiversity / geodiversity provision
- Action in planning
- Potential for low carbon development

Each of the above areas could benefit from the identification of principles, which development in the widest sense could deliver or encourage. In particular, attention should be paid as to how and to the degree to which the Black Country as Urban Park concept is taken forward. The Brades Village area lends itself well to the beacons – corridors – communities themes and other network features as described in Policy UR1A vi) in the draft RSS Phase One Revision: the Black Country.

Developments within the SPD area should be accompanied by biodiversity, geodiversity and historic environment assessments to ensure that features of value are protected, managed, enhanced or restored.

Amend to include emphasis on aspects of sustainable design that can be promoted and sought from new development.

Maggie Taylor  Sport England

Representation: Section - 5.5

Comments - Sport England would like reference in this paragraph under the bullets to ‘Active Design’ as a concept. It basically encompasses the requirement in PPS1 to ensure design/layout/linkages/signage/open space and sports provision maximise opportunities for physical activity.

Representation: Section - 5.10

Comments - the need for community sport and recreation facilities can be assessed and justified through reference to the PPG17 assessments and the use of Active Places and the Sports Facilities Calculator. Developer should be encouraged to utilise these strategic planning tools in their proposals for Brades Village.

Representation: Section - 5.11

Comments - this is strongly encouraged making a significant contribution to opportunities for physical activity.

Representation: Section - 5.12

Comments - see comments on 2.5 above

Representation: Section - 5.13

Comments - The concept of Home Zones is supported by Sport England

Amend to include reference to ‘active design’ as suggested.

Hanna Mawson  Home Builders Federation

The HBF objects to both the density and build heights policies, as they are too prescriptive.

In terms of density, development in excess of the 30 dph benchmark should only be sought, not necessarily required, and its applicability will be dependent on the site specific considerations and surrounding area. Furthermore site size densities should be based on a clear assessment of the housing need.

In terms of the building height requirement, it is considered that the restriction of two storeys would make it difficult to achieve density levels advocated by Government. Furthermore the HBF also considers the building height requirement to be inconsistent with the density guidance provided in the SPD, as it is unreasonable to expect developers to deliver dwellings of such a high density when coupled with a prescriptive building height restriction.

The HBF believes that this policy framework, without greater flexibility, would resist innovation in design and would therefore fail to provide the desired high quality, distinctive, sustainable residential community environment.

Amend as suggested, with a reduced density. Highlighting the opportunity for areas of higher density and increased building heights.
Kevin Harvey  Highways Agency  Sustainable Transport
The assessment of predicted traffic levels and impacts on the road network is only one element in the preparation of a strategic transport appraisal for a major development site. Development proposals should also include ways to reduce trips at source (particularly by single occupancy vehicles) and promote alternative modes including the use of public transport, walking and cycling.

The SPD includes the promotion of sustainable travel as one of its objectives and visions. It also identifies improving public transport as a key objective and provides for pedestrian and cycle connections within the scheme alongside associated improvements to the streetscape and traffic calming measures the HA is extremely supportive of the inclusion of these issues in the SPD.

The HA is concerned, however, that the SPD is unclear as to how these objectives are to be achieved or delivered. For example, whilst improving accessibility to public transport is mentioned in the objectives for the site, no detailed means of achieving this are set out in the scheme’s development strategy or design principles.

In general terms the HA would, therefore, encourage a more robust approach to be taken to sustainable travel and travel demand management within the SPD. To this end we would encourage the inclusion within the SPD (or as an appendix to it) an Area Travel Plan. This should set out a co-ordinated and comprehensive approach to the promotion of sustainable travel within the SPD area, including the identification of the detailed measures that will be explored / considered and proposals for their delivery. This would establish a framework against which individual planning applications could be judged and developer contributions to sustainable transport initiatives required (on this note the HA would recommend that the list of planning obligations (para. 6.5) is expanded to include contributions to public transport and other sustainable travel initiatives).

Examples of further work the HA would recommend for inclusion in an area Travel Plan include:
- The extent of the existing bus network in the vicinity should be examined and opportunity for its improvement explored. This could include investigation of the potential to divert existing bus routes through the site or increase their frequency.
- Encouragement could also be given to measures to increase bus patronage by new residents including, for example, the provision of bus passes to new residents by developers as part of any legal agreement.
- It is noted that the site lies close to a bus showcase route and the opportunity this presents should be fully investigated.

Presently, Junction 2 of the M5 experiences severe congestion and delays, particularly during peak hours. Based on the proposed scale and type of land uses, it is reasonable to assume that the Brades Village SPD proposals will have a wider area transport impact than is presently suggested in the Draft SPD.

In line with Government policy, the HA is of the opinion that development plans and supporting documents can only be credible and deliverable if transport considerations form an integral part of the evidence base. Therefore, there is a need to define realistic catchments for the proposed developments at Brades Village, assess the impact of these developments on the local highway network and the SRN, and identify potential remedial measures to mitigate these impacts. It cannot be assumed that the SRN can continue to sustain unconstrained traffic from major development such as Brades Village. Given that the whole of the Borough is within an Air Quality Management Area, an assessment of the impacts of increased traffic on air quality will also be important.

Amanda Smith  English Heritage  With respect to the draft document we welcome the consideration of the historic environment resources of the area and related design aspects under paragraphs 5.5 and 5.9.

Paul Ellingham  Alliance Environment and Planning  It is also noted that the existing residential properties on Dudley Road East whilst included in the Plan Area are excluded from the proposals for redevelopment as illustrated on Concept Plan 4. It would appear that an opportunity may be missed as many of these properties are in poor condition and retaining them may impact on the attractiveness of any new housing development on adjacent sites.

In light of this our Client supports in principle the draft proposals to redevelop the site for residential use of a density between 50 and 75 dwellings per hectare, on the basis that the Council would provide all the necessary assistance in finding a suitable alternative freehold site.
<table>
<thead>
<tr>
<th>6. Implementation</th>
<th>Joanne Ellis</th>
<th>Environmental Health and Trading Standards: SMBC</th>
<th>Section 6.5 Add air quality to list. As the SPD covers an area that exceeds the national air quality objective and the increased traffic generated by the development is likely to have a negative impact on air quality it will be necessary to continue and expand our existing monitoring in this area. Funding for this should be sought through 106 agreements. As mentioned above it will also be important to improve public transport provisions, would it be possible to also seek 106 contributions to improving public transport? As part of the air quality action planning process we have been discussing potential actions to improve air quality along Dudley Road East. Currently these will mainly involve red route works including replacing the existing roundabout with traffic lights to increase the capacity of this junction. Development should be restricted until these works have been implemented.</th>
<th>Amend as suggested.</th>
<th>Include Air Quality as a Planning Obligation.</th>
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<td></td>
<td>Richard Booth</td>
<td>Centro</td>
<td>Section 6.5 Planning Obligations Public transport should be included within this section as there are bus shelters close to the boundaries of this development area and should relocation of bus shelters be required then potential developers should bare and subsequent costs. In addition the capacity of the island at the junction of Dudley Road East and Brades Road should be analysed carefully on receipt of any future development proposals for this area as congestion already exists at peak times in this vicinity and any increase in traffic due to further development in this area should be managed appropriately.</td>
<td>Amend as suggested.</td>
<td>Include Public Transport as a Planning Obligation.</td>
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<td>Laura Hackwood</td>
<td>Environment Agency</td>
<td>The Agency welcomes the wording of the Section 6.3 and Section 6.6 as reference is made to the need to remediate contaminated land, which is an issue within the area covered by the SPD due to its industrial heritage. However, these sections refer to contaminated land being dealt with through the implementation of conditions. It should be noted that in accordance with PPS23: Planning and Pollution Control, desk studies will need to be undertaken prior to the determination of a planning application. Section 6.6 also refers to the need to submit a SFRA, as said previously a SFRA should be undertaken by the Local Authority to inform your LDF documents. A flood risk assessment (FRA) should not just be undertaken for development in close proximity to watercourses, a FRA will also need to be submitted for any development within Flood Zones 2 and 3 and any development over 1 hectare in size. This is to demonstrate that flood risk will not be generated by increased surface water run-off. In addition SUDS should be implemented for all development and their non-use fully justified. As said previously as well as offering water attenuation SUDS can also provide water quality improvement and amenity value.</td>
<td>Amend to include supporting information of the need for relevant desk studies to be undertaken prior to determining planning applications.</td>
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<td>Christopher Parry</td>
<td>Birmingham and Black Country Wildlife Trust</td>
<td>Chapter 6: Implementation We think that this chapter should also identify the relevance of the emerging Black Country Study Delivery Plan and the Black Country as Urban Park themes. Initiatives operating at the Black Country sub-regional level could also be mentioned, for example the Birmingham and Black Country Biodiversity Action Plan, the Black Country Geodiversity Action Plan and the Wildlife Trust’s Living Landscapes programme currently under development. Para 6.5 should also identify further topics to benefit from planning obligations, including biodiversity, geodiversity and the historic environment.</td>
<td>No amendment.</td>
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<td>Maggie Taylor</td>
<td>Sport England</td>
<td>Representation: Section - 6.4 Comments - the phasing set out in bullet three is strongly supported by Sport England. Representation: Section - 6.5 Comments - planning obligations should be used for sport and recreation as well as public open space. Can the second bullet be reworded to ‘public open space, sport and recreation’.</td>
<td>Amend as suggested.</td>
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<td>Name</td>
<td>Company/Position</td>
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<td>Graham Walker</td>
<td>English Nature</td>
<td>This approach would be endorsed if ‘Biodiversity’ is added to the list of features for which planning obligations will be sought (Section 6.5); we would also recommend that Green Links are added to Public Open Space eg Public Open Space and Green Links. The second bullet point of Section 6.6 Conditions should be amended to read: “It is important that open space and green links incorporate features of at least local biodiversity value and are provided within the site prior to dwellings being occupied”. Amend as suggested. Amend as suggested.</td>
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<td>Matthew Williams</td>
<td>Drivers Jonas</td>
<td>Paragraph 6.1: The following rewording is suggested This section sets out a number of issues that will need to be addressed in order to bring forward the Council’s vision for the area and deliver the co-ordinated approach required.’ Amend as suggested. Amend as suggested.</td>
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<td>Paragraph 6.2: Reword paragraph as follows ‘The Council wish to see land coming forward in a co-ordinated manner.’ Amend as suggested. Amend as suggested.</td>
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<td>‘Paragraph 6.3 We do not agree with the content of this paragraph, which outlines that the Council will not subsidise the decontamination of any sites. In relation to the former Gower Tip site, this is considered unreasonable because, should this land be required for open space within this SPD, this will be a direct result of the redevelopment of the existing Tividale Community Recreational Centre being redeveloped for residential purposes. Provision of open space at the Gower Tip site will likely also require some level of remediation works due to its past use. Moreover, it would also appear that this approach conflicts with Policy PC6 of the adopted Sandwell UDP (2004), which states that: Amend as suggested. No amendment required.</td>
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<td>‘The Council will reclaim, or support the reclamtion of derelict waste and contaminated sites to a standard commensurate with the proposed after-use…’ Amend as suggested. No amendment. UDP policy states, the Council intends to continue to support the reclamtion of sites, as and when they can be treated. However, this will be dependent, to a large extent, on the resources made available by Central Government. S106 monies will be ring fenced from all residential development within the SPD area. Amend as suggested.</td>
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<td>If the Gower Tip site is to be brought forward for open space then, in addition to the above concern, it is considered that the following additional paragraph should also be inserted to ensure that the development of the land for open space can be delivered: ‘In the case of the former Gower Tip land, should this be brought for open space, the monies necessary to secure its entire provision will be sought from residential development proposals in the SPD area, the further to the use of Section 106 Agreements set out in paragraph 6.5’ Amend.</td>
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<td>No amendment.</td>
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<td>No amendment.</td>
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<td>It is important that infrastructure serving completed phases of development is in place before occupation. Amend.</td>
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<td>Amend.</td>
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<td>Amend as suggested.</td>
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<td>Amend.</td>
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<td>Amend as suggested.</td>
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<td>Amend as suggested.</td>
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<thead>
<tr>
<th>Name</th>
<th>Company</th>
<th>Reference or Plan</th>
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<tbody>
<tr>
<td>Maggie Taylor</td>
<td>Sport England</td>
<td>Reference to Appendix 3 in Section 3.15.</td>
</tr>
<tr>
<td>John M'Cilroy</td>
<td>Transport: SMBC</td>
<td>Plan 4: The northern towpath to the Old Main Line Canal is part of the local cycle network. It would benefit from improvement works but does provide an important pedestrian/cycle connection. Why is only part of it shown as a ‘potential for pedestrian/cycle connection’. Either all of it should be shown or its existing status recognised, or shown as red dots. Shouldn’t the symbol for ‘potential for pedestrian/cycle connection’ be shown linking this northern towpath through the greenspace/green link to the new connected road up to Dudley Road East. Amend to include local cycle network.</td>
</tr>
<tr>
<td>Matthew Williams</td>
<td>Drivers Jonas</td>
<td>Plan 2: UDP Proposals Map (2004) Showing Brades Village SPD area. This plan needs to have an overarching title (i.e. Plan 2) inserted in accordance with the other plans and referencing in the document. Plan 4: Concept Plan for the Brades Village SPD area. It is suggested that this plan be reproduced to illustrate a potential site layout that is more respective of existing site boundaries. It is also suggested that this concept plan be considered as an alternative option and the title changed accordingly. The title should be changed to: ‘Alternative Option Concept Plan for Brades Village SPD area’ New Plans An existing land use plan could be a helpful addition to the set of plans provided. This would allow for a clearer understanding of the current position with regard to the Brades Village SPD area. Include new plan (Plan 4a) showing a preferred indicative concept option that illustrates the re-use, improvement and enhancement of existing recreation/leisure provision (Tividale Community Recreational Centre) and promotion of the former Gower Tip site for housing. Suggested title for plan: ‘Preferred Option Concept Plan for Brades Village SPD area’ Amend as suggested.</td>
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<tr>
<td>Paul Ellingham</td>
<td>Alliance Environment and Planning</td>
<td>However, our Client objects to a large part of the site being allocated for ‘green space and green links’ as this has a major impact on the developable area. Whilst it is recognised that there will be a requirement to incorporate amenity space or make a suitable contribution for off site provision as part of any future residential development, the extent of the ‘green space’ allocation is excessive in terms of the amount of public open space that would normally be required for residential development. In addition there appears to be further significant allocations of amenity space and open space identified in the Draft SPD to the rear of Summerton Road and at Brades Rise. Taking account of these proposed ‘Green Spaces’ and other existing areas of open space, there should be more than adequate provision to meet the future requirements for new residential development in the Plan area. The Concept Plan is also seeking to unduly restrict the design of future residential development and impacts on the opportunity to maximise the canal frontage. The Concept Plan also assumes comprehensive redevelopment of ‘North Canslside’ and appears to take limited account of the fragmentation of ownership and recognition that residential development on this land may only be achievable through a phased approach. We refer you to paragraph 6.4 of the Draft SPD, which envisages a phased approach and thus, this should be reflected on the Concept Plan. On this basis, we request that Concept Plan 4 be amended to delete the ‘green space’ allocation that falls within the Burnt Tree Site in order to reduce the impact on the developable area and provide flexibility to provide innovative design solutions and a phased approach to residential design. Amend as suggested. Display smaller requirement for on site green space.</td>
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Amend reference to Appendix 3. Amend to include local cycle network. Amend as suggested. No amendment required, as formal options are part of the AAP process. No amendment required, as land uses are referred to in the text. No amendment. Amend as suggested. Amendment to text to include reference to fragmented land ownership and need for phased approach. No phased plan as further investigatory work is required. No additional amendment required.
<table>
<thead>
<tr>
<th>Mr Harrison</th>
<th>Resident</th>
<th>Concept Plan</th>
<th>Remove properties on Brades Road from concept plan. Properties on Dudley Road East are better candidates for inclusion.</th>
<th>Amend as suggested.</th>
<th>Remove all properties from plan.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Graham Walker</td>
<td>English Nature</td>
<td>Regarding the Sustainability Appraisal Report, English Nature generally concurs with the report ie that the SPD will ensure that development within its area will not result in a reduction of the nature conservation resource and that the provision of open space and green links will result in an enhancement if they incorporate biodiversity.</td>
<td>No amendment.</td>
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<td>Sustainability Appraisal Christopher Parry Birmingham and Black Country Wildlife Trust</td>
<td>Para 1.3: Likely Significant Effects of the Plan The Wildlife Trust thinks that the conclusion that there is the potential for a minimal number of nature conservation impacts cannot be supported in the light of the lack of biodiversity baseline information given in the draft SA document. A biodiversity assessment does not appear to have been carried out for the SA work. For example, the Gower Tip site appears to support a well-established mosaic of habitats much of which could be lost. Para 3.3: Difficulties Encountered in Compiling Information or Carrying Out the Assessment The first two sentences of this para contradict each other – either there is a wide range of information available or there isn’t. The Trust’s view is that environmental information is clearly lacking from the SA Appraisal and the SPD itself. Para 4.1: Relevant Policies, Plans and Programmes The following are relevant to the SA work: • The draft RSS Phase One Revision: the Black Country, WMRA • The Black Country Study, Black Country Consortium Para 4.2: Baseline Characteristics and Predicted Future Baseline Environmental baseline data are not presented in the SA document. There is one bullet point, which makes reference to the canals in the SPD not faring well against EA criteria – whatever that criteria may be. Para 4.3: Social, Economic and Environmental Issues There is no environmental baseline data or information in the draft SA to support the identification of some of the issues in Table 2, for example nos. 3, 4, 6, 9 and 10. Table 5: Compatibility of Brades Village SPD with SA Objectives The Trust finds that without provision of a good environmental baseline data set and information, the assessment given is difficult to justify. The text beneath Table 5 suggests that local natural resources will not be impacted upon, whereas para 1.3 gives a view that there will be minimal impacts and Table 5 itself indicates a negative conflict. Para 6.3: Proposed Mitigation Measures The mitigation measures suggested from the SA work appear to be minimal. Given the lack of a good environmental baseline data set and information and hence a more robust assessment of potential environmental impacts, environmental based mitigation measures could be viewed as being lacking. Para 7.1: Proposals for Monitoring Further environmental indicators could be added to the list The Trust notes that Sandwell MBC officers have carried out this appraisal work. The SA work would have been a good opportunity to involve the local community and organisations in the development of the Brades Village SPD through workshops and other community friendly ways. The SA work represents a missed opportunity to engage the local community early, in line with the principles and requirements of Sandwell’s Statement of Community Involvement. SA Guidance encourages the consideration of uncertainty and risk. This consideration appears to be lacking in this SA. Reference is made to some difficulties but not in a structured way. For example, there is reference to data and information difficulties. On the other hand, the risk that the SPD or development in the Brades Village area may not be implemented is not considered, and neither is the possibility that it might have to undergo amendment during the course of the LDF process. There is also the risk that the vision, aims, objectives and policies are not challenging enough. Amend SA to take account of and include risk.</td>
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| Amanda Smith  | English Heritage | • Sustainability Objectives – Table 7: We strongly recommend that a clear reference is made to the historic environment as part of the sustainability framework. For example objective 9 should ideally be amended to refer to: ‘value, enhance and protect the historic environment and other features of cultural value’.  
• Proposed SA Framework Table 9: With regard to the wording of objective 9, please refer to the comments above on Table 7. With respect to the proposed indicators, the relevance of the indicator on contaminated land is questioned. The second indicator dealing with the loss/damage to protected areas or buildings is more relevant although again could be better tailored to the objective. For example, ‘loss or damage to buildings, features or areas of historic or architectural value’. An additional indicator could also be included on securing the repair and reuse of buildings which contribute positively to the character and appearance of the area’. This would also serve to bring in a wider townscape aspect. | Amend as suggested.  
Amend as suggested. |
| Kevin Harvey  | Highway Agency   | Sustainability Appraisal  
The Sustainability Appraisal (SA) sets out the sustainability objectives for the Brades Village Supplementary Planning Document (SPD), targets for the proposed development, the baseline information used to provide indicators from which the targets can be set, and the implementation of the SA. The HA recognises the importance of the document and would like to take this opportunity to aid in the development of a comprehensive appraisal for the Brades Village SPD.  
The Agency supports the sustainability objectives adopted in order to assess the requirement for an SPD and to monitor the implementation of the scheme proposed, as set out in Table 4. However, the Agency would suggest the following amendments in order for the objectives of the HA (as set out above) are protected in implementation:  
• For ‘Objective 15: Increase transport choice and reduce the need to travel’, amend the detailed indicator ‘Levels of passenger travel’ to ‘Levels of passenger travel and proportion of journeys undertaken by non-car modes, including walking and cycling, workers and residents. | Amend as suggested. |
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<th>Name</th>
<th>Organisation</th>
<th>Representation</th>
<th>Council Response</th>
<th>Amendment</th>
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<tr>
<td>Mr Tim Williams</td>
<td>West Midlands Regional Assembly</td>
<td>No representation</td>
<td>No amendment.</td>
<td>No amendment.</td>
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<td>Mr David Rhead</td>
<td>English Partnerships</td>
<td>No representation</td>
<td>No amendment.</td>
<td>No amendment.</td>
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<td>Mr Deryk Law</td>
<td>Beta Heat Treatments</td>
<td>3. Ho173 We are an established service and manufacturing company, in actual fact the largest of its type in Europe, who operate 24 hrs a day, seven days a week. The customers of whom we service include defence, formula 1 and general engineering who in most cases demand a 24 hour service. We operate in a very highly competitive sector and being unable to offer a 24 hour service would result in the loss to our competitors of most of our business, which would inevitably result in the closure of our business. Relocation of our business would require a massive logistical exercise. Our infrastructure includes gas storage tanks, one of which is a 22 ton Nitrogen gas tank, we also have a high voltage transformer of 900 Kva. Both these items would take weeks if not months to re-site. The processing equipment is extremely fragile and could not easily be relocated, irrespective of the consequences of production downtime previously stated. To ensure continuity of operation the only option if we are to survive as a business would be to duplicate our existing operation at an alternative site, put simplistically switching on the new plant minutes after switching off the old. There is no alternative unless you wish to see the disappearance in some of the last remnants of manufacturing, the very thing on which the Black Country was built.</td>
<td>No amendment.</td>
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<td>Mr and Mrs Anthony Martin and Jeanette Crump</td>
<td>Apex Machining</td>
<td>PPG4 and whole document We are a local family engineering business in Summerton Road, Oldbury. Previously we were sited at Percy Business Park, Rounds Green Road, Oldbury, approximately half a mile away. After searching the local area for larger suitable premises for 5 years we were able to purchase our current site in 2001, which fitted our growth requirements perfectly. 1. Modern Building suitable for growth 2. Large car park 3. Built for engineering not warehousing purposes 4. Cranage 5. Pleasant frontage with lawns and mature trees 6. Relatively secure 7. Electricity supply adequate to drive modern computerised machinery (no substation required) For the past five years we have invested all our time and money into the business to allow for growth and employ local people, some of whom walk to work. We also provide machining solutions for businesses in Sandwell. On Monday 17th July 2006 we were in receipt of your document ‘Supplementary Planning Document: Brades Village’. This was the first indication from you that you intend to allow housing to be built on our land. We were informed by house building companies approximately 12/18 months ago that this land had become residential but at no time has Sandwell MBC informed us of the change. These companies enquired if we were interested in selling and although we had no intention of doing so, when the question of locating to an equivalent status premises and relocation expenses was put forward by us no solution was found. 1. Why has there been no consultation with businesses in Summerton Road? 2. Has anyone from the planning department been out to look at the businesses in Summerton Road? 3. If location is required: (a) what is the timescale? (b) Where to? (premises fitting status criteria etc.) (c) Who pays for relocation expenses? To uplift and re-site the contents of a modern engineering establishment requires lengthy planning and is very expensive.</td>
<td>No amendment.</td>
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Allocated Housing proposal sites were established through the plan making process that culminated in the Adoption of the Sandwell Unitary Development Plan (2004). This process involved a detailed urban capacity study and underwent public consultation in line with government guidance. No amendment. | No amendment. |

Allocated Housing proposal sites were established through the plan making process that culminated in the Adoption of the Sandwell Unitary Development Plan (2004). This process involved a detailed urban capacity study and underwent public consultation in line with government guidance. No amendment. | No amendment. |
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<td>Mr Clarence Parkes</td>
<td>Resident</td>
<td>Plan 3: At the rear of no. 60, 58 and 56 shows a shaded area of land belonging to me. It also shows the rear driveway to my house and land shaded. In Plan 4 this is partly corrected, however, the rear access is still shown shaded for safety and security. 1. What is proposed, rear access and security? 2. Are the trees, long established to be removed, if so why? 3. Will we be overlooked? 4. What about the existing wildlife? Land forms small part of allocated housing proposal site, but would not be required for development. Guidance will promote biodiversity and advise against overlooking. Other details would be determined at planning application stage.</td>
<td>No amendment.</td>
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<td>Colin Wilkes</td>
<td>Education and Children’s: SMBC</td>
<td>The Government has announced a new Primary Schools Capital Programme to start in 2008. This programme might well give us the opportunity to replace Rounds Green Primary School with modern buildings, and it occurs to me that an appropriate site for a replacement school (better placed to serve residential areas) might be the site of Tividale Community Centre and the adjacent vacant space to the north east. The existing school would then be available for development. I shall be having discussions shortly with Neighbourhood and Community Services about relocating community provision within the “Building Schools for the Future” project planned to remodel Tividale High School in 2009/2010.</td>
<td>No amendment.</td>
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| Mr Ian Clayson        | Resident                      | i) Land is contaminated and has been a problem for years, when it was a sports field people became ill. If house go on it when they have health problems.  
ii) Effects of methane can travel underground. Will capping cause a problem for present house owners?  
iii) Will levels set be overlooking present homes?  
iv) Land slippage has been a problem for some residents. Is this to be sorted out or left to fester?  
v) Opening up of Hill Bank may change from quiet cul-de-sac to rat run.  
vi) Crime may be problem, speeding and boy racing.  
vii) Road network is not suitable because there will not be road side parking if opened up. | Ground conditions are an issue and will be addressed by the developer. Further studies will be undertaken and applicants will be required to submit the relevant information to the Council’s satisfaction. New development must consider Community Safety, crime and security and the potential for overlooking. Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement. Amend text (Para. 5.11) and concept plan accordingly. | No amendment. |
<p>| Mrs Frances Griffiths | Resident                      | I am very unhappy with the proposal to open up Hill Bank (which is a cul-de-sac) as a through road for the new housing development on the Brades Rise site. My house is the last one in the cul-de-sac and I think that it will be a lot of disruption to me. We have difficulty in parking as it is as the road at the end is not very wide, also the volume of traffic will multiply as it will be a rat run for traffic from the New Birmingham Road. Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement. Amend text (Para. 5.11) and concept plan accordingly. | No amendment. |
| Hazel Flemming        | Countryside Agency            | We are likely to become involved in only a number of selected local consultations, and we are therefore unable to offer detailed comments on this occasion. | No amendment. |
| Station Officer Gary Evans | West Midlands Fire Service | The Fire Authority has no objection to the proposal, but would be grateful if fire appliance access is considered when considering traffic calming measures. Consideration will be had for fire appliance access. | No amendment. |</p>
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<th><strong>TR Senior</strong></th>
<th><strong>Checkley and Co</strong></th>
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| It has been brought to my attention that your Authority are working up plans for the regeneration of the Brades Village district in Tividale. I understand that the Tividale Sports Ground is likely to be sold to a developer for new housing and that the “sporting” facilities are to be relocated. I believe that the proposed site for relocation is an area close to the cycle speedway track, which is contaminated ground.

My clients wondered if there might be any avenues worth exploring in relation to a combined facility to incorporate motor cycle speedway on this relocated sports ground.

I appreciate that these plans are some way from being finalised although any information you are able to supply would be greatly appreciated. Alternatively, if you believe it would be worthwhile my speaking to somebody at your Estates Department, I should be grateful if you pass on the details of the appropriate person in order that I can do this.

<table>
<thead>
<tr>
<th><strong>Mr and Mrs Jeffrey and Joy Blake</strong></th>
<th><strong>Resident</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Traffic congestion at junction of Hainge Road and Lower City Road No. 62 will be getting more noise and fumes. During peak times junction chaotic.</td>
<td></td>
</tr>
<tr>
<td>• Concerns regarding high density 70/75 dph overlooking residents – privacy.</td>
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<tr>
<td>• Drive at the side of no. 62 used by residents who have kept it clean over the years for rear access to gardens.</td>
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<tr>
<td>• Concerns regarding key opportunity points. Will these be high rise flats?</td>
<td></td>
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<tr>
<td>• Scrap yard screened by trees. Will these be removed? If so what are the plans?</td>
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<tr>
<td>• Community Centre entrance needs to be road leading into new development to help ease traffic chaos at Hainge Road.</td>
<td></td>
</tr>
<tr>
<td>• Traffic calming on Lower City Road on upward into new development needed. Rat runs through development.</td>
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</tr>
</tbody>
</table>

The SPD promotes the importance of public transport and the need for its improvement.

There are opportunities for higher density, however 70-75 dph appears to be too high for this location. The potential for overlooking will be a consideration at the planning application stage.

Key point opportunities are where the scale and massing of development needs to be addressed due to the importance of a dual aspect and primary frontage.

Guidance promotes the provision of green space and links, but details regarding trees would be determined at the planning application stage.

The entrance to the Community Centre may provide an opportunity for access to new development, however this may be too narrow.

Methods of traffic calming will be incorporated into new development with scope for retrospective methods in the surrounding area.
<table>
<thead>
<tr>
<th>Name</th>
<th>Role</th>
<th>Text</th>
<th>Amendment (Section)</th>
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</thead>
<tbody>
<tr>
<td>Mr and Mrs Justin Glover</td>
<td>Resident</td>
<td>We do not want Hill Bank to be connected to any new road ways or a path through way. Hill Bank has been a closed road at one end since it was built and the residents of Hill Bank would like it to stay that way. By opening it up as a through road or path will cause great upset to Hill Bank community. The value of the houses/bungalows will drop, traffic will increase either by road users or foot. There will be a great environmental impact from noise, rubbish etc, increase in crime. Please take Hill Bank off any proposals/plan. Any changes to Hill Bank and the residents will be looking for compensation. Our house backs onto the community ground. We do not want any buildings built on that ground that will back up to our garden. We originally bought this house because of the view from our back garden. On the original searches for the house we were told nothing would be built on the back. By building anything on this ground will devalue our house, by going from a lovely, well looked after field to housing and road ways. I would be looking for compensation if any of the views, noise levels, buildings or devaluation of our house occurs.</td>
<td>Amend text (Para. 5.11) and concept plan accordingly.</td>
</tr>
<tr>
<td>Mr and Mrs Horace and Margaret Smith</td>
<td>Resident</td>
<td>As a resident of Hill Bank we are finding it increasingly difficult to drive out into Ashtree Road during the day especially first thing in the morning. Opening up Hill Bank will only add to this traffic. From 4pm till 6pm this is a complete nightmare. Should ambulances or fire engines need to get through it would be impossible. 1000 houses built in the region would mean an extra possible 2000 cars. With the width of the road in Hill Bank. This would be of the utmost inconvenience to the residents, as well as very dangerous.</td>
<td>No amendment.</td>
</tr>
<tr>
<td>Brian Buck</td>
<td>Sandwell Cycle Speedway Club</td>
<td>As Secretary of Sandwell Cycle Speedway Club, which has been in existence for the past 59 years and which has been based at Tividale Community Recreational Centre for the last 36 years, I am very concerned for the future of the club and about the impossibility of the club being able to make any forward plans in the present circumstances. I would welcome an indication of the Council’s timescale in respect of the plans for the sale of and replacement of the sports ground.</td>
<td>No amendment.</td>
</tr>
<tr>
<td>Mr and Mrs Graham and Kathleen Hawkins</td>
<td>Resident</td>
<td>My husband and I bought our bungalow 12 months ago because it was in a quiet cul-de-sac and thought it would be a quiet area. The other reason for buying our property was because we overlook Tividale Recreation Centre. So we look out on a green area. The two reasons why we bought our bungalow are the two reasons, which you propose to alter, and we are very upset as we have spent a lot of money improving our bungalow to a high standard. By going ahead with this idea you will be devaluing our property. You state in your proposal that your aim is to make our area more secure, but by building on Tividale recreation grounds you could open us up to more crime as it would make it more accessible to get over the back of our properties and then the possibilities if you can’t sell them you will be letting them go to undesirable people, so this is a major concern for us. Regarding the road, which you have proposed to open (Hill Bank) you will not only create more of a bottleneck at the junction of Ashtree Road going into Lower City Road, but have you thought that it could cause major accidents, as there are a lot small children who play out in Hill Bank and I’m sure most parents bought their property knowing that their children would be safe. That’s one issue, what about the noise factor, not to mention the pollution we would have to inhale. We see how much traffic builds up along Ashtree Road now and it would be treble the traffic if this goes ahead. Finally if this proposal does go through, my husband will be taking the matter further e.g. compensation for the money we would lose if these ideas take place.</td>
<td>No amendment.</td>
</tr>
<tr>
<td>Name</td>
<td>Relationship</td>
<td>Section(s)</td>
<td>Address/Proximity</td>
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<tr>
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<tr>
<td>Mr and Mrs Bert and Winifred Roe</td>
<td>Resident</td>
<td>5.11 and 5.13</td>
<td>Hill Bank</td>
</tr>
<tr>
<td>Mrs Claire Glover</td>
<td>Resident</td>
<td></td>
<td>Tividale Community Centre</td>
</tr>
<tr>
<td>Mr and Mrs Gordon and Irene Withers</td>
<td>Resident</td>
<td></td>
<td>Hill Bank</td>
</tr>
<tr>
<td>Mr Alan Hill</td>
<td>Resident</td>
<td>5.11 and 5.13</td>
<td>Hill Bank</td>
</tr>
<tr>
<td>Mr J. Gittins</td>
<td>Resident</td>
<td>5.11</td>
<td>Hill Bank</td>
</tr>
<tr>
<td>Name</td>
<td>Role</td>
<td>Comment</td>
<td>Action</td>
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<tr>
<td>Mr and Mrs Terence and Joyce Bisp</td>
<td>Resident</td>
<td>As a resident in Hill Bank for a good many years, we oppose the opening at the end of Hill Bank as this property was bought as a cul-de-sac in 1959 and due to the fact the problems that Ashtree Road has had over the last few years, pupils from the comprehensive school passing through, the litter left in the street has been a problem to the residents in Ashtree Road for a long, long time. Also the traffic from the main New Birmingham Road into Oldbury. Your opening the end of Hill Bank will only aggravate the situation and make Hill Bank a rat run.</td>
<td>Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement. Amend text (Para. 5.11) and concept plan accordingly.</td>
</tr>
<tr>
<td>Mr and Mrs Stuart and Kay Barrett</td>
<td>Resident</td>
<td>I am very, very concerned about one of your plans, which wants to open up Hill Bank and put a road through it. I live in the house next to where the suggested road will be. We bought our house 3 years ago. We bought an end house in a little cul-de-sac, that was quiet and peaceful, and so that it would be safe for our 2 young daughters to play out. It will be dangerous and unsafe for mine and many other young children in the cul-de-sac to play out in. It will devalue our houses (which somebody will have to compensate us for). The road is not very wide as it is a struggle to park 2 cars opposite each other. The land that you are planning to build on is full of toxic waste. I fully remember as a teenager this land being dumped full of cyanide waste, which is still there buried. I don’t know how anyone proposes to drain big metal drums that are buried under the ground there. If we had of wanted to have lived on a main road with lots of traffic up and down, then we would have stayed in the house that we previously lived in, that was busy and dangerous. My daughters weren’t allowed out of the door on their own. We thought that it would be worth the extra money and years to give our daughters a better life and somewhere quiet, safe and nice to live. All we see and hear are birds whistling in the morning, and the peace and quiet, it is heaven. This would have the most devastating effect on every household in the cul-de-sac, our road would be used as a short cut, there will be noise, pollution, speeding etc. If this plan goes ahead we will want compensation for the devaluing of property and I’m sure that everybody else will feel the same and I’m not talking pounds I’m talking thousands. My house would not be worth as much on a main busy, dangerous road, as it is in a quiet little, safe cul-de-sac. I strongly oppose the plan to open up the road and I will do everything in my power to make sure that the plan does not go ahead. It would ruin our life, my daughters would be back to being stuck in the house again not being able to play outside on their bikes safely, they would be devastated.</td>
<td>Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement. Ground conditions are an issue and will be addressed by the developer. Further studies will be undertaken and applicants will be required to submit the relevant information to the Council’s satisfaction. Amend text (Para. 5.11) and concept plan accordingly. No amendment.</td>
</tr>
<tr>
<td>Name</td>
<td>Title</td>
<td>Comments</td>
<td>Amend text (Para. 5.11) and concept plan accordingly.</td>
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<tr>
<td>Mr Peter Miller</td>
<td>Resident</td>
<td>1. We purchased our property in a ‘cul-de-sac’ because we did not want a property on a through road. 2. If opened up, this road would obviously become a ‘rat run’. This road is not big or wide or maintained well enough to do this. 3. We have a small daughter 3 1/2 years old if this road is opened it will become dangerous – severely – for my daughter and all other children who play outside. 4. This road would be open to anyone to walk up – Obviously there is then a far more security problem and a danger to children. 5. Ashtree Road is also ‘chock a block’ at peak times so opening this road up will obviously make this problem worse. 6. By doing the proposed plan you will lose 2 football pitches and a cricket pitch. Where do you want the general public to play sport? 7. Obviously you will have more maintenance of the highway, will our Council Tax go up? 8. There is a drainage problem in this site and ground is contaminated, also there was an old marl hole, this could seriously damage the environment. 9. With more traffic down and up the road again this will affect the environment. 10. Most people park their cars on the highway so as making traffic awkward if at all able to pass. 11. Also this is a ‘cul-de-sac’ and always has been. I feel disgusted that you propose to open up a nice sub-urban street that will become dangerous, unsafe and dirty. 12. In this street we all feel very strongly about this and will be speaking to our MP.</td>
<td>No amendment.</td>
</tr>
<tr>
<td>Mr William George Mansell</td>
<td>Resident</td>
<td>I would like to complain most strongly to the proposed plan to bring the road through Hill Bank. This would in itself cause untold problems, one the road is not wide enough for the volume of traffic that would use it. One has only to look at Ashtree Road in the rush hour to see the congestion, by opening up Hill Bank would add even more congestion also at the top end of Hill Bank where it meets Ashtree Road is a very sharp narrow bend this is an accident waiting to happen. This plan would create more danger.</td>
<td>Amend text (Para. 5.11) and concept plan accordingly.</td>
</tr>
<tr>
<td>Mrs Patricia Withers</td>
<td>Resident</td>
<td>Section 5.11 and 5.13 It is important to retain Hill Bank as a cul-de-sac with pedestrian access only from the new development. Hill Bank is quite narrow and can hardly accommodate two passing vehicles. If vehicle access is allowed Hill Bank will become a congested rat run like Ashtree Road and the litter problem will become as bad as that in Ashtree. The attraction of buying properties in Hill Bank was the safety aspect for families with children, which will be lost if it opens into a thoroughfare. We feel very strongly that vehicular access into Hill Bank is not the right move and will greatly devalue the quality of life for its residents.</td>
<td>Amend text (Para. 5.11) and concept plan accordingly.</td>
</tr>
<tr>
<td>Mr John Seddon</td>
<td>Resident</td>
<td>Access through Hill Bank should not be put through, Hill Bank is a very small road where the residents have already turned their front garden into a parking area or they park on the paved walking areas. To use it as a through fare would severely add to the hazards and risks that the people and their children of this small street have to put up with.</td>
<td>Amend text (Para. 5.11) and concept plan accordingly.</td>
</tr>
</tbody>
</table>
Mr Peter Rathband  
Resident

Section 5.10: Facilities
It is my express wish that the proposed development of this site should not proceed and that the existing facility be conserved as green belt. Additional local shopping provision would encourage young persons onto the area during school terms and evenings to cause both loitering and vandalism offences, which are already prevalent in the surrounding areas where shops are situated. I would suggest that if the proposed development proceeds that no provision is made for retail shopping facilities, and should consist of residential, welfare and leisure buildings only.

Section 5.11: Access and Connections
Hill Bank has enjoyed cul-de-sac status for many years and with it the benefit of extremely low vehicular traffic, consisting of residents and visitors only. It is my opinion that if Hill Bank is connected to the new road system, vehicular traffic would prove to be excessive, especially during commuting hours. I would suggest that Hill Bank retains cul-de-sac status to conserve the existing environment, or the provision for pedestrian traffic only.

Section 5.12: The Environment
It is noted that the provision of high quality public open space on the Gower Tip site will be made but only if the area can be decontaminated to appropriate levels. It would be beneficial to all residents if Gower Tip site was decontaminated and made into Public Open Space in any event and that Tividale Community Recreational Centre remain undisturbed along with all mature trees on the site boundary. It would be helpful if proposals could be made with regard to levels of disturbance that should be expected if this development proceeds to all local residents during construction works eg noise, dust, pollution, site traffic and anticipated duration of development.

Section 5.13
The proposed connecting links through the site from Brades Road to Lower City Road plus Summerton Road, appear adequate for the new development in total and it is suggested that Hill Bank access is restricted to residents and visitors only, should this development proceed.

As documented, the land at Tividale Community Centre presents an opportunity for development, which requires further investigation. If realised, provision will be made for new recreational facilities and any new development must have consideration to the surroundings.

Mr Alan O’Toole  
Resident

If Hill Bank is opened up it will be a rat run the same as Ashtree Road is at present. It is used as a short cut off the Wolverhampton Road through to Oldbury. It will also lower the property value and increase the crime rate.

Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement.

Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement.

Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement.

Mrs Gurjit Kaur  
Resident

Section 5.11: Access and Connections and 5.12: The Environment
I am opposed to the idea of opening up the road at the end of Hill Bank. I reside here and feel in doing this it would turn what is now a very quiet cul-de-sac into a busy, congested, noisy road. At the moment the only people accessing this road are the residents and their visitors.

I also oppose the exchange of land with Tividale Community Recreational Centre for housing. My rear garden backs onto the land at the centre. Presently this land has quite a lot of use from the archives at the centre, which I personally access regularly. This would be lost in the building of houses here.
<table>
<thead>
<tr>
<th>Name</th>
<th>Role</th>
<th>Concerns</th>
<th>Pedestrian access through Hill Bank</th>
<th>Amend text/Plan</th>
</tr>
</thead>
</table>
| Mr K. Delehay          | Resident      | 1) Excess traffic movement – no access for emergency traffic  
2) Excess noise  
3) Excess crime rate  
4) Devaluation of my home  
5) Safety to others ie children  
6) Loss of community in Hill Bank (spirit)  
7) No way do I want this after 28 years of living there | Hill Bank would be more suitable in terms of sustainable design and movement  
New development in the SPD area will have consideration to the Community Safety SPG. | No amendment. |
| Mrs Christine Delehay  | Resident      | As a council tax payer and resident of Hill Bank, Tividale for 28 years, I strongly object to the plan for our cul-de-sac to be opened up as a thoroughfare. It is not wide enough for extra traffic, including emergency vehicles. Young children play safely here, parents enter and exit Hill Bank in their cars with care. Children’s lives will be put at risk.  
Wintertime, Hill Bank can be difficult to exit, because of the incline to Ashtree Road. Local school children would use Hill Bank as a short cut, up to four times a day. We would have litter dropped (like in Lower City Road) Hill Bank residents know each other, most have lived here 25-30 years. My own daughters played safely here. I would like to see our younger couples afforded the same safety and freedom as mine did.  
Hill Bank is a safe clean and quiet cul-de-sac. I for one want it to remain that way. | Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement. | Amend text (Para. 5.11) and concept plan accordingly. |
| Ms Evelyn Swallow      | Resident      | I don’t agree with the road opening up. It will be too busy, we will have lots of rubbish from the school children, such as tins, bottles and crisp packets. | Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement. | Amend text (Para. 5.11) and concept plan accordingly. |
| Mr Ronald Griffiths    | Resident      | Hill Bank is a small cul-de-sac hardly wide enough for 2 cars to pass. Opening it up would increase crime and burglary, increase noise, pollution, pedestrians, cars etc.  
Our homes would be more opened up, encouraging theft, our property’s would lose value, which I hope you are prepared to pay us compensation for, for wrecking our lives, we live privately and quietly and that is how we would like to keep it thank you. | Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement. | Amend text (Para. 5.11) and concept plan accordingly. |
<p>| Mrs Clare Cave         | Resident      | Having lived in Hill Bank since August 1996 my husband and I would not like to see any changes such as the road being opened up and made into a through road. We also have concerns about any form of walkway as we feel this will create a place for youths to congregate and possibly create noise and trouble at night. | Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement. | Amend text (Para. 5.11) and concept plan accordingly. |</p>
<table>
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<tr>
<th>Name</th>
<th>Role</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Mrs Yvonne Wilkinson</td>
<td>Resident</td>
<td>We moved into Hill Bank just over 2 years ago. We decided to move here because of the privacy of our back garden having nothing overlooking us. On our searches there was nothing shown on plans to say that the Community Centre would be changed into a housing development. I also object to the road opening in Hill Bank, again this was another reason why we came here, we have 2 small children and at the moment can play safely out on the front. I have had valuers come in and have asked for a quote on how much our property is worth now and when the road opens up and was told it would devalue the property by at least £10,000. There are sufficient openings for this proposed development without opening up Hill Bank. (1) Brades Rise (2) Ashtree Road, a gap between the houses on the left as you go down (3) Summerton Road (4) New development down where new houses are (5) Lower City Road On the subject of facilities, by taking away the community centre, what facilities are there for young children, there was football on there, cricket and other things. With today’s society there is not enough for kids to do and they wonder why kids hang about on street corners getting into all sorts of trouble.</td>
</tr>
<tr>
<td>Mrs Marie Sheldon</td>
<td>Resident</td>
<td>I am concerned at the proposal to open Hill Bank into a through road. It will create a ‘rat run’ and the increased traffic will create congestion at peak times. Historically, this road is badly maintained and additional traffic will compound this. If this proposal goes ahead can we expect a reduction in Council Tax to compensate for the added nuisance.</td>
</tr>
<tr>
<td>Mr Andrew Parsons</td>
<td>Resident</td>
<td>Before moving to Hill Bank, the land searches that were carried out made no suggestion of plans to build at the rear, where the community centre is located. This was a major factor when we considered moving to the road. I feel there is no need for a connected road at the rend of Hill Bank as there is sufficient access from Brades Rise, Lower City Road and Summerton Road. This would bring about Hill Bank being used as a ‘rat run’. The main reason for moving to Hill Bank was that it is a dead end road, so this situation would not occur. A couple of years ago the residents of Hill Bank put together a petition for fencing to be erected at the bottom of Hill Bank as there were drunken youths causing anti-social behaviour in the early hours of most mornings, jumping on cars and damaging people’s gardens. This problem would return and in my opinion be far worse with vehicle and pedestrian access. All this would also bring about a dramatic reduction of the value of the houses in Hill Bank, therefore residents will lose money.</td>
</tr>
<tr>
<td>Mrs Eileen Miller</td>
<td>Resident</td>
<td>Section 5.11: Plan 4 Everyone in this street paid more for their homes, because it was small and quiet. Now you want to take it back, free! Do you think that is fair? I don’t think so! Nowhere is safe today, but this will not help one bit.</td>
</tr>
</tbody>
</table>

As documented, the land at Tividale Community Centre presents an opportunity for development, which requires further investigation. If realised, provision will be made for new recreational facilities. Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement. As documented, there will be scope for additional community facilities in association with new housing development where the need is identified. No amendment.

Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement. Amend text (Para. 5.11) and concept plan accordingly.

Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement. Amend text (Para. 5.11) and concept plan accordingly.

Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement. Amend text (Para. 5.11) and concept plan accordingly.

Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement. Amend text (Para. 5.11) and concept plan accordingly.
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</tr>
</thead>
<tbody>
<tr>
<td>Mr David Wilkinson</td>
<td>Resident</td>
<td>The major reasons for us moving into Hill Bank were the fact that there were no houses overlooking us at the rear garden, and with it being a cul-de-sac it would be a safe and private road. With the proposal to open the road, this would surely bring a ‘rat run’ situation and would make this small cul-de-sac noisy and dangerous. We have had a valuation of our property and have been told that opening up the road would reduce the property valuation by £10,000.</td>
<td>Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement.</td>
</tr>
<tr>
<td>Mr Allan Hadcroft</td>
<td>Resident</td>
<td>I am against Hill Bank being opened up into a through road. Despite official assurances to the contrary, I believe it will create a ‘rat run’ at morning time and during the evening, also, I believe it will also create congestion where it joins Ashtree Road. Also extra noise and pollution will ensue.</td>
<td>Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement.</td>
</tr>
<tr>
<td>Miss Jess Barrett</td>
<td>Resident</td>
<td>If you open our quiet little cul-de-sac the amount of noise and traffic will be terrible. We will not be able to get off our drive in a morning. I’m only 11 and I’m just going into High School and I do not want to be late on my first day at my new school.</td>
<td>Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement.</td>
</tr>
<tr>
<td>Miss Katie Barrett</td>
<td>Resident</td>
<td>I don’t want the end of Hill Bank to open because we will not be able to play with our friends on our bike, it will be too busy. And there will be litter and if it rains it will make the crisp packets wet and we might slip and get hurt. And in the mornings there will be lots of noise, on school mornings we will not be able to get off the drive, that will make us late for school. And when it comes to bedtime we wont be able to sleep. And it will take value off our house and we moved here to be more safe. We have lived here for 3 years in December and we are enjoying it here and we have made lots and lots of friends and we don’t want to leave them.</td>
<td>Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement.</td>
</tr>
<tr>
<td>Mr Michael Hill</td>
<td>Resident</td>
<td>Plan 4 and Section 5.11 With regards to opening up Hill Bank onto proposed new residential development, I must object strongly. This would subject Hill Bank residents to potential nuisance, burglary etc and change the general dynamic of the cul-de-sac. We moved here for the very fact that it was a quiet cul-de-sac and I think it disgusting that the Council seem to think that must change. It would devalue the properties and subject us to any “yob culture” or nuisance from through traffic, kids etc.</td>
<td>Pedestrian access through Hill Bank would be more suitable in terms of sustainable design and movement.</td>
</tr>
</tbody>
</table>
Laura Hackwood  Environment Agency

Strategic Flood Risk Assessment
We note that your Authority has not undertaken a Strategic Flood Risk Assessment (SFRA) to inform your Local Development Framework (LDF).

SFRA is a requirement outlined in the forthcoming Planning Policy Statement 25: Development and Flood Risk (PPS25), which is due to be adopted by the DCLG in October 2006. SFRA is a strategic document, which Local Planning Authorities in England and Wales are expected to produce to inform their new LDF documents. SFRA takes a strategic look at flood risk within a LPA area. All Development Plan Documents produced by a LPA should be informed by SFRA to ensure that plans, programmes, allocations etc are sustainable from a flood risk view point.

As your Authority has not yet produced your SFRA, we object to this document. The SFRA will form an evidence base regarding flood risk. Only with this document can we comment as to the sustainability of your LDF documents. We would be happy to discuss this matter further with your Local Authority and offer advice where required. Upon completion of a suitable SFRA, the Agency may be in a position to review its stance and would then comment as follows:

To reiterate, the Agency objects to this document, as it is not informed by a SFRA as required by the forthcoming PPS25.

Amend text (Para. 6.6) to include para. explaining that the completed SFRA will supersede all flood risk information within the SPD. Amend text to emphasise the need for the reduction of surface water run off and the promotion of SUDS in line with PPS25.

Mr M. Harrison  Resident

Introduction
Sandwell Council’s approach to the Brades Village area has logic to it; the development of a Strategic Plan to try to co-ordinate potential development of the area by individual developers is sound to prevent a disjointed redevelopment. If properly executed, a coherent plan should, in theory, lead to a more organised and thus desirable residential area that in turn will help improve the area. This, however, is based upon the initial premise that the area needs to be redeveloped, which is not necessarily the case. There do however seem to be many issues about the plan and statements in the accompanying Supplementary Planning Document (SPD) which are less sound in their nature.

The Plan in General
The plan (Plan 4: Concept Plan for the Brades Village SPD Area) appears to be the physical manifestation of the Council’s ‘Vision’, section 2 of the SPD. Much of this Vision is common sense or statement of fact, but later points are somewhat less logical and do not appear to show much vision at all.

The plan to remove the excellent Tividale Recreational Centre and build a somewhat smaller facility just a couple of hundred yards away is nonsense. This site is an excellent facility and is the only one of its kind in the area and must remain, but the cost of downsizing it (which is inferred by the plan) and moving it such a small distance seems a complete waste of effort and money, for no apparent net gain. Locating any new facility in the dead-centre of a new housing estate also seems questionable and liable to increase traffic on residential roads to gain access to the facility. Likewise, the cost of providing the ‘Focal Green Point’ on the map will be exorbitant, given the ground condition, contamination and topography, especially as comparable facilities are already there.

Allocation of the area north and west of Summerton Road to housing appears to be a reversal in planning strategy. The majority of the factories along that road are new, in excellent condition, and situated in maturing green environments. It appears that this land is to be purchased for no other reason than to create a ‘residential canal side frontage’, with a significant environmental cost to be paid of knocking down new factories. The elevation of the canal side would rule out the area for many families with young children, and it should be noted that the close by Waterways Drive offers plenty of waterside accommodation. This

Allocated Housing proposal sites were established through the plan making process that culminated in the Adoption of the Sandwell Unitary Development Plan (2004). This process involved a detailed urban capacity study and underwent public consultation in line with government guidance.

Further investigatory work will be required to assess the cumulative effects of potential residential development on the existing road and strategic highway network. Planning

No amendment.

No amendment.

No amendment.
however can hardly be regarded as a success, with 25% of the properties for sale, to let, or empty, which questions the Affordable Housing requirements and shortages claimed by the Council in the SPD. The development is far from desirable, has a decadent feel to it, and is representative of many other waterside development in Sandwell which do not live up to their promises. There is no reason to suspect that the proposed development on the south bank of the canal would be any different and the work which would need to be undertaken to make the canal bank good would be staggering. The development would be blighted by the building currently taking place on the corner of Summerton Road/Brades Road/Brades Rise, which is as aesthetically unpleasing as residential buildings get, with a towering, utilitarian look and very ordinary standards of workmanship. The Council statement to put 3 storey building on canal sides and road frontages is exactly the opposite to what current residents desire, hiding the better quality housing behind a high ‘façade’, and lowering the perceived image of the area. Multi-storey housing would be better located in the central areas of the development. The new multi-storey housing on the corner of Brades Road/Rise is a perfect example of why this housing should not be built on a frontage.

Easily the worst housing in the area is that on the corner of Brades Road stretching along the Dudley Road East. Much of this is empty and derelict, but the Council choose to exclude this from its plans for redevelopment. There seems a lack of logic to this and it must be rethought.

The demand on the local transport infrastructure would be severe, with the roads in the area already suffering congestion during the day. Access to and from the development could be a problem, especially for the proposed high density development on the bottom of Lower City Road and Dudley Road East, being close to two canal bridges and a road junction, it is difficult to see where access to this land can be safely gained. Likewise, turning right into Summerton Road from Brades Road and out of Summerton Road right into Brades Road is positively hazardous at present due to the bridge and bend in the road. This will become more pronounced as the number of residents and thus commuters increase. North of the bridge the road is even more dangerous, but more about this later.

Any proposed development in general must, as the Council identifies, have many attributes including diversity, affordability, sustainability, etc. The majority of developments in the area and its surrounds fail in many of these criteria, and it is difficult to see that thinking is different on this particular plan and that lessons will be learnt. The proposed high density housing on Brades Road north of the canal is in complete contrast to the houses on the opposite side of the road, which are of traditional semi-detached construction. The council premise of businesses being unsuitable, undesirable, or incompatible with housing development (it is assumed this is the reason for relocating businesses) is also erroneous, for as long as due consideration is put into building design and landscaping, they needn’t be mutually exclusive, thus eliminating expensive relocation and demolition. Indeed limiting the size of housing developments may lead to positive improvements. It is vital to avoid the 30-40 year regeneration cycle as seem the norm with Council developments (i.e. Brades Flats) as this is ecologically disastrous. Dwellings built correctly should have 2-3 times that life.

**Brades Road North of the Canal**

Most of the people involved in this report live in Brades Road, north of the canal, and though the scheme in general is of concern, the development plans to the north of the canal are of particular interest to the residents.

The area is currently a mixture of residential and industrial properties, and the road itself is fairly pleasant with lots of trees, plants, and greenery down both side of the road, and a mixture of properties, in generally good condition. Certain aspects of the road need immediate attention, as certain parts are unsightly, falling into disrepair, or require other work. Moving north of the canal along Brades Road, consideration is needed of the left hand side of the road which is included in the SPD. Firstly, immediately north of the canal is a piece of land which cannot be built upon due to its proximity to a gas main. Brades House stood on this site, until compulsory purchased and demolished by Sandwell Council in the mid 80’s in nothing less than an act of vandalism. Two years ago, an unsightly fence erected by Sandwell Council on this land, which detracts from the area enormously, where bollards would have been much more suitable. Adjacent to this are three houses, 76, 78, and 80 Brades Road which are modern, well maintained and privately owned. This area is the start of the high density housing planned on the SPD, and a ‘Key Point Opportunity’ is highlighted for the area. Access here is dangerous and SMBC were forced to alter the recently erected fence due to hampered visibility when leaving the properties on the road in the proximity of the hump-back bridge.

The next property – no. 82 has been empty for 10 months since the previous occupier died. What was recently a delightful cottage has been left to rack and ruin by uncaring owners, who are allegedly interested in redeveloping the area. The property could have a beautiful front aspect if maintained in a caring fashion. No. 84 is the driveway to the industrial yards housing applications for housing development in the area must be accompanied by a detailed transport assessment. Planning obligations will be sought in association with housing development for contributions to public transport.
Burnt Tree Vehicle Hire, which is being left in an appalling condition, with the next house (86) being a most attractive detached double fronted property with delightful gardens. The next property is the offices of Burnt Tree, with trees and gardens to the fore. Lastly, the bottom corner of the road consists of the side wall of Cox’s Crane Hire’s compound and a Hairdressing shop. Continuing around the corner on to Dudley Road East is the access gates to Cox’s and a long terrace of houses (including a shop), the first of which are derelict but are amazingly excluded from the plan. If any one single area should be earmarked for any work, this is it. Behind this façade of houses is a piece of industrial ground, currently used by Burnt Tree for vehicle storage.

Though the area is in reasonable condition, the appearance of the street is being spoilt by the action of non-residents, some of whom have a desire to redevelop it. This is ruining the environment for the locals and is becoming a driving factor for the Council’s wish for regeneration. Firstly, the erection of the unsightly fence, by SMBC, is totally out of keeping with the area. Secondly the condition that number 82 has been allowed to deteriorate into requires addressing. This is an attractive property forming part of the character of the road. Similarly, the driveway adjacent to the cottage is appalling. Both of these areas are owned by Burnt Tree. Similarly, the houses at the bottom of the road are owned by Cox’s, and again a non-resident is dragging the area down. The whole area would be improved if the property owners were acting responsibly – maybe the Council should act.

The appearance of Brades Road has character due to the number of differing housing styles and trees, and it is difficult to see that the area would be improved by the Council plans for high density housing. Access close to the canal bridge is hazardous due to the nature of the road, and the volume of traffic and queues during peak time is already bad, and a high scale development would exacerbate this.

A smaller scale development maintaining the frontage to the road, but using land which is industrial could offer a solution, and would not disturb current residents, the character of the street, and without the destabilising nature of the plans. There are plenty of access points to a development behind the houses which are also situated well away from the bridge and poor visibility areas. This would alleviate the need for compulsory purchases. Any attempt to build housing similar to that on the corner of Brades Road/Rise would be opposed vehemently by local residents. Questions raised above regarding the ecology and the wisdom of using precious resources replacing good housing for no real need should also be taken into account.

Finally, Brades Bridge, which was rebuilt in the 1980’s was a missed opportunity. The bridge is on a bend in the road and with the number of council vehicles based at the nearby refuse facility using the road, and the buses which needlessly use the north part of Brades Road, the bridge makes the road unsafe. Extreme care has to be taken leaving properties on to the road, and it would be unwise to have increased vehicular access on the first 50m or so north of the bridge. This would make high density housing there difficult to access, as drainways on to the properties would be dangerous. A single access point, possibly the drive way to the industrial yards, would make a sound point of access.

**Conclusion**

There are many good points to the plan but much more the Council should take into account. In short:

The reason behind the SPD is sound, but has many flaws and is unsympathetic to the wishes of many local residents. The character of the area will be changed and many of the schemes seem a poor use of resource (i.e. moving the Recreation Ground). The plan can read as a slightly detached ‘wish list’ of planners, but in trying to meet many needs it risks becoming unworkable and poorly thought out.

The plan is in danger of becoming a driver; that is a document created to coordinate potential development could becoming a master plan to which development companies see as a council target and try to implement it. This may give momentum to a plan, which is not necessarily the best for Brades Village and may become difficult to alter, control, or stop.

Certain interested parties are possibly allowing the area to become run down and are thus destabilising the area and undermining property values. This will make the apparent need for redevelopment seem more important than it actually is. Council intervention is urgently required with irresponsible land owners to prevent further degradation of the area. The Council itself must further consider the implications of its own actions on the quality of the environment (i.e. the eyesore fence by Brades Bridge).

The degree of real informative consultation has been very lacking, and full copies of the SPD should have been distributed to all neighbouring residents rather than an uninformative letter. This would have encouraged a fuller and more representative debate.

The SPD is to provide additional guidance for new development that can be used as a material consideration in the determination of planning applications. The very fact that the SPD has been produced will act as a catalyst for new development.

No amendment.

No amendment.
with local residents and produced a plan in keeping with local requirements.

A lack of value is being put on resources. Moving good facilities and planning over good quality existing housing is nonsense. Effort should be put into regenerating derelict properties like those on the corner of Brades Road/Dudley Road East, which are currently excluded from the plan, though the need for action is pressing. The housing in Brades Road which is included in the plan is in good condition, occupied and provides a varied, attractive frontage if the surrounds are kept in suitable condition. To consider replacing this is poor thinking from a community viewpoint, and is a waste of good buildings.

Finally, a degree of arrogance is present on the Council’s part to consider planning for replacing the homes of individuals and publishing such a document, without giving the individuals the courtesy of being told the details of the plan. In certain case, this document was the first thing many residents knew.

Recommendations

The whole concept of redeveloping the area needs to be discussed before any more planning work is undertaken, as the need and desire for redevelopment needs to be established before any plans are made.

A fuller, detailed, and more meaningful consultation should be undertaken with local residents before any further planning.

The Council uses whatever powers it may have to prevent further deterioration of the area, thus making the apparent need for regeneration seem less urgent.

The plan is rethought being more sympathetic to householders and business, and rather than taking a broad brush approach, tries to fit in around existing properties if possible.

With relation to Tividale Community Centre and the Former Gower Tip site, the SPD identifies ways by which the land can be used efficiently.

Consultation has been undertaken in line with government legislation for the preparation of SPDs.

No amendment.
Kevin Harvey  Highways Agency

The HA considers that the potential improvements to the local area created by the regeneration will be significant and of benefit to the local community, and is supportive of the principle of the SPD and its general approach. The HA has reviewed the document with a view to ensuring that the potential impacts of the development on the strategic road network have been approximately considered and that opportunities to explore, promote and deliver sustainable transport measures have been maximised. We have made a number of suggestions and recommendations that we consider could improve both the document and its evidence base, which we hope you will find helpful and constructive.

Impact on the Trunk Road Network

It is noted that the SPD builds on residential allocations already contained within the UDP. The number of houses envisaged on the site has, however, nearly doubled (from 494 to potentially over 1000). Given this significant increase in housing numbers, the impact of the scheme on the A4123 and M5 J2 needs to be carefully assessed.

Presently, Junction 2 of the M5 experiences severe congestion and delays, particularly during peak hours. Based on the proposed scale and type of land uses, it is reasonable to assume that the Brades Village SPD proposals will have a wider area transport impact than is presently suggested in the Draft SPD.

In line with Government policy, the HA is of the opinion that development plans and supporting documents can only be credible and deliverable if transport considerations form an integral part of the evidence base. Therefore, there is a need to define realistic catchments for the proposed developments at Brades Village, assess the impact of these developments on the local highway network and the SRN, and identify potential remedial measures to mitigate these impacts. It cannot be assumed that the SRN can continue to sustain unconstrained traffic from major development such as Brades Village. Given that the whole of the Borough is within an Air Quality Management Area, an assessment of the impacts of increased traffic on air quality will also be important.

This assumes that such traffic assessment work has not already been undertaken by your Council. If it has, then the Agency would be grateful to receive a copy of any work undertaken for further review. If transport assessment work has not already been undertaken, then the HA would be happy to liaise with you regarding the scope and content of further transport assessments. These assessments should feed into a strategic appraisal of the transportation implications of the proposals.

Conclusion

The HA would recommend that a strategic assessment is undertaken of the transportation implications of the proposals. This should include assessment of the interaction between the local and strategic road network and the wider transportation system (public transport, walking, cycling). The aim should be to identify the scale and nature of improvements that would be required to accommodate the developments and the opportunities to reduce travel demand at source, influence travel behaviour and promote the use of sustainable transport modes. The HA would suggest that this is then developed into a range of specific measures to be included in an Area Travel Plan.

The HA would be happy to work in partnership with Sandwell MBC to advise on the form and content of this strategic appraisal.

The comments of the highways agency are noted however, given that these are SPDs and the principle of the development has already been established in the Unitary Development Plan (2004) a STA is not considered to be appropriate. However, the SPD will have an amendment, which identifies that there maybe implications on the adjoining highway network arising out of the development and that applicants may be advised to consult the Highways Agency.

Amend text (Para. 6.6) to include reference to transport assessments.