

## **Chairman's report**

We are much less active as a branch than I would like. In the past this may have been related to a lack of financial resources, but since we received a large legacy that is no longer our major difficulty. A much greater one relates to having the personnel to mount and manage campaigns.

The only significant activity in Wychavon has been to object to a caravan park on Great Comberton Golf Course, at the foot of Bredon Hill. This was just outside the Cotswolds Area of Outstanding National Beauty (which includes Bredon Hill), but close enough to have a severe adverse effect on the setting of the hill. We cannot claim much credit for this, as the local parish council, the Bredon Hill Society, and Housman Society all took the same view. I am pleased to say that the Wychavon Planning Committee agreed by refusing the application.

### ***Volunteers needed***

We remain desperately short of volunteers to help with planning issues in several parts of the county. Frank Hill covers Malvern Hills. I cover Bromsgrove and Wyre Forest. I also try to monitor Redditch and strategic planning in Dudley, but we are seriously falling down in the south and east of the county. What we really need is to have people on the ground who can go and look at sites and tell us about them.

CPRE also campaigns nationally on many issues. We would in theory like to deal with some of these locally, but lack the manpower. On the litter front, we have seen a success with a charge being levied on plastic bags. Other campaigns include tranquillity, dark skies, agriculture (and land use generally), but we do not have the human resources to address these.

We are also in need of volunteers to help judge the Best Kept Churchyard and School Gardens Competitions.

### ***National Consultations***

In the past year or so, I have contributed to consultation responses to two Housing White Papers and then the Revised National Planning Policy Framework. The latter is the subject of a separate article.

### ***Solihull***

During the year, I provided advice to our Warwickshire colleagues on landscape issues. This concerned the preservation of medieval hedgerows along lands in the country south of Solihull, which was historically part of the Forest of Arden. Arden was never a royal forest. Large parcels had been inclosed in the high medieval period, sometimes leaving broad greens along lands and sometimes narrow lanes. The concern was (and is) not to allow the lanes to be widened, as a means of discouraging housing development.

### ***A personal note***

I am in the course of editing my *Gazetteer of the British Iron Industry, 1490-1815*. This is a massive work that will probably come out in excess of 500,000 words. It has been taking all the time I can spare to tie up the loose ends of many years' research; eliminate infelicitous expressions, typos, and mispunctuation; and to ensure that the whole thing is consistent rather than self-contradictory. This is a massive effort and has meant that I have had rather less time to spend on CPRE work and other voluntary activities.

*Peter King*

## Wyre Forest District Report

The major issue in Wyre Forest is the revision of their Core Strategy. This was adopted in 2010, just as the new Coalition Government was starting to abolish the old Planning Policy Statements and Regional Spatial Strategies, in advance of bringing in the National Planning Policy Framework. It is good practice to review District Plans about every five years. Here Wyre Forest District Council is concerned that their Core Strategy, being written under the now abolished West Midlands Regional Spatial Strategy may fail to be NPPF-compliant. I cannot fault the Council for wishing to have a review, but I am very critical of the way they are going about it.

An early consultation for this was held in the past year, on which I had the help of Gerald Kells. Our problem with what the Council is proposing is that they are planning for housing considerably beyond the *Objectively Assessed Need* (OAN), which they are required to meet. The size of the OAN is always slightly debatable according to what subjective spin is put on the basic population figures; indeed at time I wonder if this (and certain other councils) are not in fact seeking to plan for *Subjectively Assessed Need*. Wyre Forest has been doing little to constrain housing growth. The Plan sets a target of about 200 per year, with some front loading to the early years. Actual delivery in recent years has been slightly higher, more like 250, which can be taken as actual demand. However the proposals consulted upon took the highest possible figure from recent experience and added another 1000 houses for a 20 year period, giving an inflated target in excess of 300 per year.

Kidderminster has not been a flourishing town since a collapse in the carpet trade in the 1980s. It is not as if there is a massive amount of new employment planned, which will require extra workers. As far as we can work out the extra 1000 is intended (misguidedly) as its contribution to the housing land deficit in Birmingham. Birmingham does indeed have a deficit, which will have to be met beyond its boundaries, but government figures issues with the White Paper *The Right Homes in the Right Places* suggested Birmingham needed only 71,000, not 88,000; it has urban capacity for 50,000. The National Planning Policy Framework requires that these should be met within the Housing Market Area (HMA) in question – here, Birmingham and the Black Country. Two recent reports on this issue, one by Peter Brett Associates and the other by GL Hearne and John Wood plc, have both concluded that Wyre Forest District is *not* part of the Birmingham and the Black Country. This was also the basis of the present Core Strategy, which operates on the basis that the Housing Market area is coterminous with the district. They cannot have it both ways!

Wyre Forest has done very well in building a large amount of its housing growth on brownfield (previously developed) land. It achieved this by undertaking a review of its industrial sites prior to the 2010 Core Strategy, and concluding that several of them were surplus to employment land requirements and could be released for housing. In addition, they were persuaded that the site of the old Sugar Beet Factory (designated as a regional employment site) could not be profitably redeveloped unless housing formed an element of this and that the former Lea Castle Hospital as a major derelict brownfield site in the Green Belt could also be developed for housing. Both of these are very large windfalls for the Council, beyond what it was planning in 2010.

By adopting an excessive target, the Council finds itself without land to meet their inflated target. It can only do so by removing land from the Green Belt. It seems to have decided without question that Kidderminster should grow eastwards, on to Grade 2 farmland, some of the best in the area, land that ought to be kept in agricultural production to meet the food needs of a growing population.

We mildly opposed the redevelopment of Lea Castle Hospital on the basis that the proposals were too dense for a rural location and using what has been garden or park land that was never in truth 'previously developed', but the Council approved this. I have also opposed an application for development of land at Stourbridge Road, Hurcott, in the edge of Kidderminster, which is for Safeguarded Land (still known by the old title of an Area of Development Restraint), on the basis that the application is premature, until the Council releases it from being Safeguarded, which will inevitably happen when a new plan is adopted.

I fear that the result of this will be the most appalling sprawl. The Lea Castle development fills in a gap between the land at Hurcott and the village of Cookley. In each case there is a gap of a couple of hundred metres only. Worse still, within the gap in what was Lea Castle Park, the Worcestershire Minerals Plan consultation proposed a sand and gravel extraction site. It is true that there is a dearth of potential places for such within the north of the county, but that does not mean that it should be done in the strategic gap with Kidderminster to the south and Cookley and Wolverley to the north.

We supported an action group at Bewdley, led by residents, in their efforts to prevent a large development between the town and the Wyre Forest. The applicants were Gladman, who seem to be a predatory land speculation company, whose business is obtaining planning consent so that they can sell land on at a profit. As far as it known they build nothing themselves. Their campaign was heavily backed in the town. With help from qualified planners (which I am not), they were able to defeat the proposal. The action group also won at a planning appeal, but the latest news is that Gladman have applied to the High Court for Judicial Review. That is available only on a point of law, whereas the decision seems to be a matter of planning judgment by the Planning Committee and then the Inspector. Planning judgment is an issue of fact and thus not amenable to Judicial Review. I am thus hopeful that the objectors will again be successful. I have also opposed an application by Gladman on the edge of Stourport, though largely in Malvern Hills District. Like the Bewdley case, this is west of the Severn and thus beyond the edge of the Green Belt

*Peter King*

### **Dudley report**

We lack the manpower regularly to participate on planning issues in Dudley. I live 200 yards from the boundary, but am not regularly monitoring planning applications there to see which are unacceptable. I do however try to keep an eye on strategic issues. The current one is the Black Country Core Strategy. I participate in various regional CPRE meetings over this. CPRE is better able to address such matters at a regional level than at a county branch level, as there is no county branch for the West Midlands County. We operate according to pre-1974 boundaries. This means that parts of it fall into the areas of three different county branches. There was an Issues and Options Consultation for a revision of the Black Country Core Strategy. We are awaiting the next consultation on this. Perhaps the best news is that the controlling group on the council has instructed their officers to halt work on a Green Belt Review until the officers produce a report saying (in accordance with the emerging Revised NPPF) that there really is no alternative to altering Green Belt boundaries. I am not sure we can claim much credit for the decision.

*Peter King*

## **Bromsgrove and Redditch Districts Report**

I added Redditch to what I dealt with when Val Kendrick became too old to take care for CPRE's concerns in that district. Sadly she has now passed away (see Obituary). It is far enough from where I live to be beyond the area that I know well. However, most planning issues there are urban ones, modest developments on brownfield sites. We have not opposed a development site, partly in Redditch and partly in Bromsgrove, called Brockhill East; indeed we think there is an opportunity for more land to be made available.

The big concerns are the development on major sites on the edge of Bromsgrove and Redditch. Foxlydiate is in Bromsgrove District, but will in effect be a vast new suburb of Redditch. We opposed this at the Examination, preferring another site. We also opposed it as an application, because until the adoption of the new Bromsgrove District Plan in 2016, it was Green Belt. We also suggested some changes to the detail outlined. Those are matters that did not need to be decided at that stage, but some criticism may cause the developers to rethink their proposals. The application has been approved in principle.

There are two large sites on the west side of Bromsgrove, one known as Perryfields and the other as Whitford. The problem is that they have poor highways links. The developer at Whitford was turned down on highways grounds; lost on appeal; and lost again in the High Court. It is still negotiating with the Council over a renewed application. There is also an outline application pending for Perryfields. What I last saw implied the two developers had contradictory proposals as to the junction with Kidderminster Road. The Whitford developer has bought a pub in order to improve a crucial road junction, but the councillor who has led the opposition (when I last heard) was not convinced this solved the problem.

Bromsgrove has a housing land supply problem. Including the sites just mentioned, it has 4700-4800 sites to meet a target of 7000 houses by 2030, a target slightly greater than its Objectively Assessed Need. The only way it can provide for its missing 2200-2300 sites is through releasing land from the Green Belt; there is literally nothing else feasible. I am expecting a consultation on the methodology for this from July to September this summer, followed by a call for sites in the autumn.

We have been suggested for several years that there is a solution to access to Perryfields. This involves completing a link road between the Stourbridge and Birmingham Roads, of which the first section has been built as part of the access to the Barnsley Hall estate. This would be paid for by allowing housing on the land along it. That land is currently Green Belt, but we consider it is not an important part and that M42 would provide a very robust new boundary for the Green Belt. Of course, any loss of Green Belt is regrettable, but we are between a rock and a hard place: something has to give, and regrettably it can only be the Green Belt boundary.

I have opposed a small number of other applications, but most have been relatively small and with the objective of keeping planning policy intact. These have included sites at Romsley and Hopwood which adjoin the boundary of the Village Envelope, but are beyond it. Adjusting the Village Envelope boundaries slightly may well be appropriate as part of a Green Belt Review, but only through the review, not *as hoc* through planning decisions.

*Peter King*

## Greater Birmingham HMA Strategic Growth Study

A major issue in our region is housing demand from Birmingham. The Birmingham Plan claims to have an Objectively Assessed Housing Need of 88,000, but only land for 50,000, implying that 38,000 houses must be built for it beyond its boundaries. Figures released with the government's White Paper, *The Right Homes in the Right Places*, suggested a target of only 71,000. The same set of figures reduced Redditch's need from 337 per year to 183, with a marginal increase for Bromsgrove.

There have been two reports into Birmingham's problem. The first was commissioned by the Greater Birmingham and Solihull Local Enterprise Partnership with the Black Country LEP from Peter Brett Associates a couple of years ago. The latest Greater Birmingham HMA Strategic Growth Study (GBHSGS) is from GL Hearn and others for a consortium of 14 local authorities, funded with money left over from the former West Midlands Regional Authority. Both concluded that Bromsgrove and Redditch were within the Greater Birmingham and Black Country Housing Market Area, but Wyre Forest (though a client of GBS LEP) was not. They also concluded that South Staffordshire was within the HMA, but it is not a member of either the GBS or the Black Country LEP. The commissioning 14 local authorities have expressly agreed that its conclusions are not the policy of any of them. To them, it appears to be the basis for further consultation, etc.

Currently there appears to be no plan for this to be implemented formally by the 14 councils adopting it as any kind of joint core strategy. If it was, it would at least provide some certainty, even if we do not like Hearne's conclusions. I understand from Warwickshire colleagues that there was a "Memorandum of Understanding" between Coventry and various Warwickshire councils. When their plans came to be examined, this Memorandum of Understanding became effectively a *fait accompli*, which objectors were unable to challenge as being unsound. If the Hearn report is treated in a similar way, it would be a worrying development, detracting from the relatively democratic manner in which strategic planning is developed.

The GBHSGS sets out a series of target areas for housing growth, classified as 'Proportional Dispersal' (modest expansion of the built up area), 'Urban Extensions' (2,500-5000 houses) and 'New Settlements' (over 5000 houses), with others with no candidate site in our county. These were then whittled down to a short list, by eliminating those assessed as less sustainable.

- UE1 is an area of countryside within Dudley Borough between Halesowen and Stourbridge.
- PD7 involves expansion on the southern edge of Bromsgrove and is linked to use of the railway from Bromsgrove.
- PD5 involves expansion in the Wythall area, perhaps involving filling in gaps between the various settlements in Wythall and perhaps between them and Solihull.
- NS5 probably does not affect Worcestershire, but is near it. It is shown as sausage-shaped, but I suspect the intention is to build a new settlement near one of the stations on the Stratford railway line.
- NS4 is shown as an inverted Y and described as between Birmingham, Bromsgrove and Redditch. With small scale plans, it is far from clear what is intended, but the intersection of the three limbs appears to be where Alvechurch is, probably involving major new development along the Redditch line, perhaps joining up or greatly expanding Alvechurch and Barnt Green.

As ever, we are between a rock and a hard place. With population growth more houses are needed and they have to go somewhere. This makes it very difficult to oppose them all, much as we might like to.

*Peter King*

## **Revision of National Planning Policy Framework**

As I write the government has recently closed a consultation on a revision of National Planning Policy Framework. NPPF was adopted in 2011 to replace a large number of Planning Policy Statements. The idea was to simplify the planning process and to focus on 'sustainable development'. Behind this lies a body of Planning Policy Guidance. However, in practice it has just brought in a new set of rules, which clever planning consultants are trying to find loopholes in. They will always argue that whatever horrible development they put forward is sustainable. The problem is that sustainability is a rather woolly concept.

Since the last election, the government has produced two White Papers on housing and made a number of other announcements. The Revised NPPF brings these together and consolidates them into the original 2011 NPPF. Some of this is about ironing out anomalies and making it easier for Neighbourhood Plans to operate. CPRE Worcestershire did not respond to the latest consultation as such, but I participated in a seminar at our National Office, as part of the process of producing a One-CPRE response.

The new NPPF contains a number of things that we welcome:

- An explanation of what constitutes 'Exceptional Circumstances', such that Green Belt boundaries must be altered. The council must first consider all other options.
- There is some better protection for the policies of Neighbourhood Plans, but they are still liable to be overturned by the adoption of a new District Plan.
- There is some emphasis on brownfield first, but it might be stronger.

On the other hand:

- The slightly bizarre situation that a plan can be deemed out of date, even if it has only just been adopted, if the district does not have a 5-year housing land supply.
- District Plans are expected to be revised every 5 years, which may be good, but this also means that Neighbourhood Plans will need to be revised every five years. Since they are prepared by volunteers, requiring a lot of effort by them, it is questionable whether there will be the will to keep these up to date.
- The calculation of Objectively Assessed need is liable to be driven by a need to meet targets in Strategic Economic Plans produced by Local Enterprise Partnerships, but SEPs are liable to be highly aspirational, proposing growth at a rate that is unlikely to be achieved. They do this in the hope of outbidding other areas for European and government grants. If this was a kind of proposal existed in one area, it might be feasible, but almost every SEP has an unrealistic target. The result is to skew housing targets into meeting a highly Subjectively (not Objectively) Assessed Need.
- This in turn leads to excessive housing targets being adopted, which means that more green-field sites are identified than necessary. As greenfield sites are easier to develop than brownfield sites, the laudable target of 'brownfield first' is undermined.

In summary, there are good things in the Revised NPPF, but there is a lot that could still be improved and may be when the final version is promulgated, probably in the autumn. This of course assumes that the new Secretary of State does not decide to scrap existing plans and start again.

*Peter King*