



The
countryside
charity

Planning Strategy
Birmingham City Council

West Midlands
*From the regional
vice-chairman*

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Dear Sir,

Birmingham Plan Consultation

I appreciate that your consultation closed last night, so that this submission is technically too late. It is intended to supplement what I said both on behalf of this regional group and on behalf of our Worcestershire Branch in submissions made a few day ago. The need to send in this late submission is consequent on concessions made by the government relating to the planning part of the Levelling Up Bill, as reported by BBC last night and in *The Times*, p.2 today. I am not clear whether the concession was made just before or just after the consultation formally closed, but it was made too late for it to be feasible to amend our responses to refer to it. The full press release is at <https://www.gov.uk/government/news/communities-put-at-heart-of-planning-system-as-government-strengthens-levelling-up-and-regeneration-bill>

In Gerald Kells' report, which was part of our regional submission, he pointed out that your council was entitled to depart from the Standard Methodology in certain limited circumstances. After referring to the present 300,000 annual national target, *The Times* says (apparently quoting the Secretary of State):

These targets will now be advisory and councils will be able to set a lower level of home building if complying with the targets would “significantly change the character of the area”. Examples cited include the significant loss of rural or suburban areas.

As explained in the report, it would seem that your council could only achieve its Standard Methodology target through the development of what is currently Green Belt, whether in your city or beyond its boundaries. This would be a significant loss of “a rural area”, adversely affecting its character. Accordingly, the announcement is highly relevant to the housing target about which you consulted.

The announcement was only about proposed changes to a bill before Parliament (now at its Commons Report Stage) and ones promised to NPPF and a statement to Parliament is expected today. It remains to be seen how these will be enacted, but they are matters that you should be taking into account in responding to the now-closed consultation.

Yours Faithfully,

P.W. King

Vice-Chairman, CPRE West Midlands and Chairman, CPRE Worcestershire