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Strategic Planning
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West Midlands
*From the regional
vice-chairman*

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Dear Sir,

Your issues and options consultation

I am writing to respond to this consultation on behalf of the **West Midlands** regional group of CPRE (part of the national charity) to the above consultation. I have submitted a separate response from CPRE Worcestershire Branch (whose chairman I am). There may be a separate response from CPRE Warwickshire Branch, perhaps dealing with more detailed issues.

Our case concentrates on housing and economic need and supply and is supported by a detailed technical report which we commissioned from Gerald Kells, and which accompanies this letter.

We anticipate further issues may be picked up as the plan progresses.

In summary:

Housing

We are deeply concerned that your council has presented the Government's housing targets as if they were on tablets of stone. They have asked people to consider options for housing in the city but effectively tied their hands behind their backs. It is clear there are, and will be, many more brownfield sites that can meet genuine housing need in the city where it is needed.

We consider the consultation to be flawed because it has not offered any options as to what the appropriate housing target should be. It merely repeats the target set out in the government's Standard Methodology, without considering the qualifications to this, which allow LPAs to depart from it when robust evidence exists to do so. This is something your council's own consultants told you could be justified.

We also consider that you have failed to take adequate account of windfalls as a source of supply, when recent historic data would justify an annual supply of 1500 houses per year, rather than your 584 (rounded up to 600).

Given that this is an Issues and Options consultation alternative scenarios should have been considered (not least the figure suggested in the HEDNA).

We do support in general terms the first 5 Options for housing supply. However, they would all require suitable caveats. We do not support Option 6.

Green Belt can only be released where "exceptional circumstances" exist. As no adjacent council has available land in excess of its own needs other than Green Belt

land, an excessive housing target will inevitably result in more land being taken out of the Green Belt than needs to be. This will in turn reduce the pressure on your city to bring about “urban regeneration, by encouraging the recycling of derelict and other urban land” (NPPF 2018, 134e), which is one of the five purposes of the Green Belt. This can only be judged as a property of the Green Belt as a whole, not any individual parcel of it. Excessive releases from the Green Belt inevitably undermine that purpose.

Economic Land

In terms of economic land, we consider there is sufficient to meet the needs of the city, including land released from HS2 sites. We do not consider there is a need to include the land at the West Midlands Rail Freight Interchange as meeting Birmingham’s need. It would be better if more of that land was set against needs in the nearby Black Country authorities if a deficit is established there in upcoming local plans.

The full list of conclusions in the report are set out below.

Yours Faithfully,

P.W. King

Vice-Chairman, CPRE West Midlands

Birmingham Plan Report Conclusions

4.1 Housing requirement in the Plan

- a. There appears to be adequate evidence to adopt a lower figure than the Standard Methodology calculation of need (something supported by the HEDNA).
- b. There appears to be a strong reason for Birmingham to challenge the additional ‘35% uplift’ as unjustified.
- c. There is significantly greater housing supply over the plan period, particularly for windfalls, than the Issues and Options paper and the HEDNA suggest.
- d. The current unmet need is, therefore, exaggerated.
- e. A lower housing figure would provide a sufficient workforce to meet economic requirements.
- f. The Issues and Option Paper should have set out and consulted on lower housing requirements. This could be undertaken through a supplementary consultation within the Issues and Options framework.
- g. The Sustainability Appraisal should have considered reasonable options that included lower housing needs; this needs to be done now.
- h. The Options 1 to 5 for providing additional housing are reasonable and generally sound, but each would need suitable caveats.
- i. Option 6, the release of Green Belt for housing, is not sensible, and not justified. The ‘exceptional circumstances’ test for release of Green Belt would not be met. It would need to rely on projections of unmet housing needs despite adoption of Options 1 to 5 which cannot be demonstrated from the evidence.
- j. Option 6, or reliance on the Duty to Co-operate, would lead to unsustainable development patterns which would be likely to increase congestion and air-quality issue as well as undermining Climate Change goals.
- k. Option 6 would be likely to have adverse impacts on landscape quality.

4.2 Employment land needs in the Plan

- a. In all scenarios there appears to be adequate land to meet both baseline and growth needs.
- b. This should include land released from HS2.
- c. There appears to be no need to include land at the West Midlands Rail Freight Interchange which would be better included in employment needs for the four Black Country Authorities.