



The  
countryside  
charity

Strategic Planning,  
Birmingham City Council

**Worcestershire**  
From the chairman

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Dear Sir,

### **Response to new Birmingham Plan**

CPRE is a federation of charities. This is a response by the **Worcestershire** branch. It is likely there will be separate responses by the West Midland regional group (probably by myself) and by the Warwickshire branch. I have seen the regional response, which is much more detailed, and my branch agrees with it. By convention within CPRE, Birmingham is considered to still to be part of Warwickshire. Accordingly, this response is principally concerned with the relationship between your city and Worcestershire, particularly with Bromsgrove District, which adjoins part of the southern boundary of the city.

We are concerned that the housing targets being proposed are too high, being considerably in excess of the actual need and failing to take adequate account of windfalls having historically provided a more significant source of supply than suggested by the consultation documents. Accordingly, the shortfall identified at 4.15 is exaggerated. I have seen the proposed response by the regional group in draft and support its conclusions.

To achieve the city's housing target, even a more modest one, it will almost certainly be necessary to implement all or most of options 1-5 listed at 4.17.

**Option 1 Housing density:** We support this, but care must be taken that there are appropriate recreational facilities available.

**Option 2 Land assembly:** We support this. We recognise that the use of CPOs is often politically difficult, but this is an appropriate tool in your city's armoury for tackling issues of land availability. This should not be something that needs to be limited by the city's financial resources, as the value of an assembled site, made available for development is likely to exceed the value of its parts, so that there will ultimately be a profit for the city, not a cost. Of course, land assembly may be associated with costs for decontamination, or other remediation or amelioration, but that is a different issue and one for which government or combined authority funding may be available.

**Option 3 Housing regeneration:** We support this in principle, but care will need to be taken that the result is in fact an increase in density, as areas of pre-WWI terraced housing can already have a high density.

**Option 4 Open Space:** Care needs to be taken that open space really is both poorly used and likely to remain so. A sports pitch that is poorly used because it is regularly waterlogged may better be kept and improved by drainage, rather than developed. Similarly, urban woodland is hardly amenable to use other than by walkers and runners, but is potentially important for climate change as a carbon sink, as well as improving the character of adjacent areas. Sites important for nature (whether or not designated as nature reserves) should also be retained.

**Option 5 Under-utilised employment sites:** Such sites have in the past been a major source of supply for brownfield windfall sites, perhaps the most notable in recent times being the former motor-manufacturing site at Longbridge, only part of which has so far been redeveloped. This is a counterpart to the strategy on employment sites set out at 7.24, of which we are generally supportive. In particular, the category of Regional Investment Sites is an obsolete one, as single applicants requiring sites on this scale are rare.

**Option 6 Green Belt:** We oppose any loss of Green Belt land. Its use should absolutely be a last resort. Green Belt is supposed to be permanent and should not be reviewed each time there is a new plan. Its review is supposed to be “exceptional”, not a routine element of a Plan Review. Having reviewed its boundaries five year ago, no review should even be contemplated before about 2040, in other words beyond the Plan Period of the proposed plan.

**Duty to cooperate: the view from Bromsgrove District:** There is an implicit threat posed by excessive housing targets that your city will seek to export its excess housing need to neighbouring areas. The city has in the past sought provision for its needs as far afield as South Worcestershire, which is a different Housing Market Area (HMA) from Birmingham and the Black Country. We suspect that the adoption of 1000 houses beyond actual need for Wyre Forest district was the result of peer-pressure in meetings of the GBS LEP, but this is housing that Wyre Forest ought not to have been obliged to provide, because it is also a separate HMA whose bounds approximate to those of the district.

In thus defining HMAs, I am relying on data on travel to work patterns undertaken for the purposes of the former West Midlands Regional Planning Guidance, based on travel to work data from the 2001 census. This showed that the Birmingham Travel to Work Area had a boundary that approximately coincided with the boundaries of Bromsgrove District. I regret that I can no longer locate the maps in question. My local knowledge suggests that the situation has not markedly changed since then, but the use of data based on the 2011 census or better still the 2021 census (when available) is of course to be preferred.

The area in Bromsgrove District immediately south of the city boundary is generally very rural, unspoilt countryside. Within this are the town of Bromsgrove and a series of large villages, Wythall (several settlements), Alvechurch, Barnt Green, Catshill, and Hagley, all of which are separated from the city by countryside. In contrast Rubery and Cofton Hackett are contiguous to your city. The area between the Wythall bypass (A435) and Alvechurch is an exceptionally unspoilt rural area without any villages.

Bromsgrove District has its own housing issues. The current plan was adopted despite failing to provide enough housing to meet its identified need, on the basis that there would be an early Green Belt Review to identify additional land to meet its housing supply deficit. The same plan provided two large sites adjoining Redditch but in

Bromsgrove District to meet Redditch's needs. However the application of the Standard Methodology to Redditch's housing need indicates that its plan (adopted at the same time) overestimated its need, so that these two large sites (at least in part) can revert to being part of Bromsgrove's supply. These sites (Brockhill East and Foxlydiate) both have at least outline planning consent, as do two large sites on the west side of Bromsgrove (Perryfields and Whitford). These are presumably providing housing land supply for Bromsgrove's needs for the moment. Nevertheless, the deficit identified in the 2016 plan remains. It is understood that considerable work has been done towards the required Green Belt Review, but its outcome remains unknown. Work on a new plan has been halted for the moment due to uncertainties over infrastructure requirements, particularly highways and schools.

With Bromsgrove having difficulty in addressing its own housing needs, it seems very doubtful whether it is capable of providing any supply towards the needs of Birmingham. Accordingly, Birmingham needs to find means of providing for its own needs within its own boundaries.

Yours Faithfully,

**P.W. King**

Chairman, CPRE Worcestershire