



The
countryside
charity

Worcestershire
From the chairman

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Director of Planning
Birmingham City Council

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Dear Sir,

Birmingham Plan 2024: Preferred Option Consultation

This is the response of the Worcestershire Branch of CPRE to the Birmingham Development Plan consultation. A separate response has been provided by me for the West Midlands regional group of CPRE, and other CPRE branches (at least Warwickshire) will probably also respond.

This response is principally concerned with the impact of Birmingham on the adjacent area of Worcestershire, namely Bromsgrove district.

The Bromsgrove situation

Green Belt

Substantially the whole of the undeveloped land in Bromsgrove district is Green Belt. It serves to keep Birmingham and the Black Country separate from the town of Bromsgrove and from the large commuter villages within Bromsgrove District, particularly Hagley, Catshill, Barnt Green, Alvechurch and Wythall, all of which have populations great enough for them to be classified as market towns in more rural regions. The two remaining larger settlements within Bromsgrove District (Cofton Hackett and Rubery) are contiguous to Birmingham and so have no Green Belt gap between them and Birmingham.

Regional Park

National Trust are developing the concept of an Eight Hills Regional Park, stretching from Wychbury Hill in Hagley to Weatheroak Hill in Alvechurch. I am led to believe that this is supported by Bromsgrove District Council and so expected it to be referred to in their plan, which I now expect to be consulted on in the autumn. This is an area of valued landscape. Part (at least) of it was formerly designated as a Landscape Protection Area (or such like) under planning policy of the 1990s, deriving from the Worcestershire County Structure Plan of that time. I therefore anticipate that the emerging Bromsgrove Plan will make some provision for its protection. See:

<https://www.nationaltrust.org.uk/visit/worcestershire-herefordshire/clent-hills/8-hills>

Landscape

CPRE Worcestershire commissioned research into part of the area (Clent and Lickey Hills), which provided recommendations for areas suitable to be designated as protected landscapes and additional areas to be designated as buffers to protect these. A full version of the report can be downloaded from

<https://www.dropbox.com/sh/cu97th78lzka8oy/AAB8UK4FAaeXU-Ttjpic0C7la?dl=0> A compressed version is attached.

Observed from the south, this is a range of hills, but from the north, the elevation above the surrounding area is rather less, because Birmingham and the Black Country occupy a plateau. It is nevertheless undesirable that Birmingham should expand to penetrate the range of hills.

Land supply

Bromsgrove's last plan was adopted with an explicit policy for a Green Belt Review to provide more land to meet its own housing land supply need. Such a review has not been completed, partly due to difficulties in obtaining evidence on subjects for which Worcestershire County Council was responsible and partly because Redditch's plan (examined and adopted at the same time) estimated its housing need considerably in excess of the need estimated under the current Standard Methodology. This meant that land on the edge of Redditch released by Bromsgrove from its Green Belt for the alleged needs of Redditch was not needed for them and could instead supply Bromsgrove's own needs. It nevertheless remains the case that Bromsgrove has scope to meet part of Birmingham's land deficit.

Housing supply options

If the dearth of housing land supply in Birmingham is really as great as the consultation document indicates, it is likely that almost all the options offered must be pursued. The response made by our regional group examines that issue in detail.

- Some increase in densities is almost inevitably needed, but the very high densities suggested for the city centre are no doubt fine for single people and childless couples, but rather less so for families with children, who need some safe outside space.
- Proactive action by the council in land assembly is certainly needed, including the use of Compulsory Purchase Orders, though it is appreciated that these are often politically unwelcome, as a form of expropriation.
- Regeneration of older lower density estates is essentially an implementation of the previous two options.
- The development of under-utilised open space raises the difficulty of who or what may currently be using it. Sites identified as SSSI, Nature reserves, and such like need to retain protection from development, as do linear wildlife corridors. Trees are important as carbon sinks and for the mental health benefits of a greener environment.
- It will certainly be important not to hang on to employment uses where there is little scope for its continued use. Studies in the Black Country have indicated that there is often significant capacity for new housing in local centres.
- Further development of the Green Belt should always be the option of last resort. Accordingly, we support the statements in paragraphs 4.34-4.

- The final option (not mentioned in the consultation document) is not to provide for the whole of Birmingham's alleged need within the city boundary, but to seek to export population to other places. Both Telford and Shropshire have plans that provide for more housing than they need. However, the use of the M54 corridor is more suitable as an option for Wolverhampton than for Birmingham. Constraints on many of the districts around the conurbation mean that they have difficulty in meeting their own housing need, let alone providing for Birmingham's.

Affordable housing (Policy HN2)

The current policy provides a threshold where sites of less than 15 houses have no obligation to provide any affordable ones. However, for sites of 16 houses or more 35% must be affordable. This is an illogical threshold, possibly influenced by provisions formerly in NPPF, which encouraged a threshold of sites of 10 houses. In the current NPPF this provision has been removed, except a threshold of 5 houses in rural locations. Birmingham has a target of 35%. We recall Birmingham arguing at the Longbridge AAP examination that it was delivering a 40% target. When the target is 35% affordable, the threshold should be sites of three houses, which would deliver one affordable house: 35% of 3 is 1.05. If it is 20% (which seems rather low), the threshold should be five, again delivering one house. The targets in these cases should perhaps be expressed as "more than two" and "more than four", to make it clear that sites of three and five respectively must deliver at least one house

Build to rent

We believe the greatest need is not so much for "affordable housing", provided by the council or social landlords, as for housing that will be available for renting in the long-term by those who cannot afford to buy. It should be possible to find institutional investors, such as pension and insurance funds, which need a long-term secure income, to invest in build-to-let projects. We do not understand what barriers exist to this kind of investment, unless it is a reluctance founded in memory of the old Rent Acts and the fear that these might return. Accordingly, we welcome paragraphs 4.46-7.

Size (Policy HN3)

We would suggest that the focus on housing construction (particularly affordable and other housing to rent) needs to be on smaller dwellings, with only one or two bedrooms to make good a deficiency in this type of housing. The demand for this was exacerbated by the so-called Bedroom Tax some years ago, but there is also a need for such housing into which "empty nest" couples (and singles) can downsize, thus releasing larger dwellings for growing families. In failing to specify any targets for housing mix, the Plan is setting itself up to fail to meet actual needs, as opposed to the house types that developers find most profitable.

Other housing policies

We do not understand the distinction between shared living and HMOs. These are in essence much the same thing, except perhaps in terms of quality.

Housing for the elderly and the disabled is certainly to be encouraged, but any policies that seek to require such people to live in specialist accommodation would be deplored.

Yours Faithfully,

CPRE Worcs: from the Chairman Dr P.W. King

P.W. King

Chairman, CPRE Worcestershire