



The
countryside
charity

West Midlands

Election for Mayor of the West Midlands 6 May 2021

Putting right planning for new housing – a call to election candidates April 2021

Introduction

We are at a critical time for the planning of housing in the West Midlands. As we come out of the COVID pandemic the future looks very different but the way we plan for housing and economic development is stuck in a rut.

As candidate for West Midlands Mayor, you will be in a position to challenge the current approach in Local Plans which is failing communities and the countryside and urge the Government to put urban regeneration centre stage.

On 16 December 2020 the Government put out a statement¹ withdrawing the proposed, and much-criticised, new 'algorithm' for calculating housing needed, which would have forced more new housing into the countryside.

That statement by the Housing Secretary sets out good reasons why housing should be prioritised in cities. That is where services are, where land and buildings used for retail and offices is expected to become available, and where accommodating housing would help to protect the environment and curb Climate Change.

But this is not currently happening. The Local Plan procedures are continuing to mechanically churn out Local Plans which will push too many houses into the wrong places: villages, the countryside and especially the Green Belt.

To stop this, we need fundamental change to how both housing need and supply is calculated and, in the interim, the Mayor of the West Midlands must press for a change of attitude by planning authorities and the planning inspectorate to curb the on-going assault on the West Midlands Green Belt and other precious areas of the region's countryside.

¹<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>

CPRE in the West Midlands urges you to put this at the front of your agenda.

What the West Midlands needs is:

1. a re-examination of urban capacity for housing
2. a review of the role of town and city centres post COVID
3. immediate advice to local authorities and the inspectorate that halts the over-estimation of housing need and the underestimate of supply
4. an urgent review of the need for Green Belt releases.

Too Many Houses?

Planning authorities are required to follow the Government's Standard Methodology to calculate the housing requirement in their area. This uses the seriously out-of-date 2014 Office for National Statistics population and household projections and adds onto them an 'affordability' allowance which is higher where houses are more expensive relative to income.

Even though the resulting figure is already above the actual demographic need, the planning authorities, including those in the West Midlands and surrounding Districts cannot, except very exceptionally, adopt lower figures.

More recent ONS figures have been produced, based on the years 2016 and 2018. Both show a lower national housing requirement, but, of the two, the 2018 figures distribute more housing to the West Midlands because they are based on shorter term migration estimates, which we believe makes them the less reliable.

The Government, however, refuses to use either of the newer figures because they do not support its artificial target of 300,000 homes per-year in England. This number is politically-chosen and lacks any evidential justification.

Not only do the ONS2014 projections assume that the size of households will continue to decrease, despite evidence to the contrary, but they rely heavily on changes in registrations with NHS doctors, which are unreliable for assessing population levels or movements. This makes them prone to over-estimation, especially where there are large short-term populations.

It has been demonstrated, for example, that the large number of students in Coventry's Universities have created a 'phantom' population (something the UK Statistics Authority is currently examining). Yet, despite the evidence that the population projections for the city are far too high, because of the current system, Coventry City Council has removed countryside from the Green Belt in the narrow Meriden Gap on the west side of the city and is seeking to grant permissions for thousands of houses there, when there is no need to do so.

And the approach to housing numbers is not consistent. Some authorities in the West Midlands, such as Wyre Forest District, where the newer population and household projections are higher, are adopting those, which is leading to double counting with neighbouring authorities (such as the Black Country) using the 2014 figures. This could perversely lead to both sacrificing Green Belt for the same projected need.

Others, such as Shropshire Council, are using optimistic economic models to justify higher housing numbers, without any demographic justification. Not only is this a circular argument because the economic models actually rely on the additional housing to create the jobs, but it is not balanced out by reductions in numbers set for other local authority areas to compensate for extra people moving to Shropshire.

But, ironically, this playing with figures does not lead to new homes being built where they are most needed, in the West Midlands conurbation. Instead, it allows developers to get more land allocated in the countryside, particularly the Green Belt, which threatens to create permanently unsustainable patterns of development in the West Midlands.

The December 2020 policy change adds a further distortion. To give the appearance of a shift to prioritising brownfield development, the Government has increased annual requirements for new housing numbers delivered within Birmingham, Coventry and Wolverhampton by an arbitrary 35% 'uplift', without making any reduction in the numbers set for rural and part-rural planning authority areas around the conurbation. This imposed extra requirement undermines the current Mayor's policy to direct funding to the re-use of urban land and so avoid loss of Green Belt. It risks the three cities pressing that land now Green Belt is released for housing, to provide for the exaggerated housing numbers imposed on them.

The Hidden Supply

The current planning system create a second serious distortion because a Local Plan is supposed to allocate every bit of land than is 'needed' for housing, up to 20 years in advance. Many Local Plans even 'safeguard' land for development for longer than that, so it is lost to the Green Belt now.

That causes oversupply of green field land for housing and increases the loss of Green Belt and other countryside.

At the same time a major source of supply, the constant churn of new sites for housing development in towns and cities, (sometimes small and sometimes quite large,) is ignored. These so-called 'windfall sites' cannot be exactly identified, but there is likely to be an on-going supply of such sites.

The Government's December 2020 statement would suggest that we should be relying more on such sites. It suggests we are entering an era where there is likely to be unprecedented change to our urban environment, where sites that have been used for retail and office use will increasingly become available for housing or mixed-use development.

But such 'windfall' sites are almost entirely ignored when housing is planned for, even when there is strong supporting evidence. Planning authorities are positively discouraged from including an allowance in their calculations unless they can show 'compelling' evidence and, even then, only for sites of less than 10 houses.

For example, the Birmingham Plan, passed in 2014, has been shown to have drastically under-estimated windfalls, surpassing its allocation year on year. Yet despite that the housing numbers required on allocated sites in the city remain set in stone. Green Belt in the Langley area east of Sutton Coldfield has already been lost to housing development as a result.

Even, when authorities do include windfalls, for example in Wyre Forest, they only include them in their five-year supply, not in their longer-term figure.

Not only could windfalls offer a major source of housing all across the West Midlands conurbation, such housing could also make better use of land. With careful design we can ensure the density of development delivers sufficient new homes without compromising wild spaces or encouraging people to travel further.

All planning authorities in the West Midlands, within and outside the West Midlands Mayor's area, should be pressed to immediately review the capacity of their town and city centres for new housing, as well as other potential brownfield sites, so they can meet future needs on sustainable locations near to services and accessible by public transport.

If the 35% 'uplift' proposals are persisted with, this will be doubly important. Otherwise, that uplift will push even more housing into the Green Belt where it is never going to be sustainable, or near services, and will be largely car-dependent.

Protecting the West Midlands Green Belt

The biggest loser from poor planning policies and a damaging housing methodology is the countryside. In and around the West Midlands conurbation the areas most at threat are mostly in the Green Belt.

Despite positive statements from the Government supporting the Green Belt, and repeated claims that the 'exceptional circumstances' approach used for deciding whether to change its boundaries offers strong protection, the reality is different.

Once a housing figure for a Local Plan area has been produced using the existing methodology, it is then deemed sufficient to justify development on Green Belt to 'meet housing need'. In some cases, such as the part of the Green Belt that lies in Shropshire between Wolverhampton and Telford, this includes meeting a claimed overspill need from the Black Country.

There is a huge appetite among developers for Green Belt development. A Black Country call for sites resulted in developers putting forwards 2399 hectares of Green Belt, with a further 613 hectares was identified in South Staffs and Cannock.

As a result, the methods for planning for housing in use in 2021 put a hefty burden on local residents on the edge of the conurbation, in villages within the Green Belt, and in the countryside beyond. They are put in the position of being forced to defend where they live from developers and their consultants and even their own planning authority.

Authorities feel under pressure to release Green Belt sites. They are warned that if their plans fail an Examination for lack of housing numbers, their housing supply will be deemed insufficient, and they will lose planning appeals to developers making speculative applications.

To justify such Green Belt deletions a planning authority uses a Green Belt Review, undertaken by consultants. This is not a strategic review of the whole Green Belt but a local review which identifies parcels of land that can be developed with least effect on the immediate area around.

We consider this a deeply flawed approach. Individual parcels are assessed rather than the cumulative impact, those parcels do not necessarily match the borders of specific development sites and results vary depending on the size of the parcels.

Worse, there is no public consultation as the review is carried out.

Most worryingly of all the reviews do not assess the value of the Green Belt in bringing about the reuse of brownfield land in urban areas, even though this is one of the five stated national justifications for Green Belts.

The reality is that the current system of development planning allocates land for housing in the wrong places and where they are least needed. The only people to benefit are the developers who have bought or obtained options on greenfield land and can make high profits if they are able to gain planning permission.

Sustainability and Transport Impacts

In its latest statement the Government is clear that we need to reduce our carbon footprint and to address urban congestion and pollution. But the only way this policy aspiration can be supported through planning policy is with urban regeneration and public transport initiatives.

Even if new dormitory estates in the Green Belt include some local 'facilities', they inevitably create unsustainable patterns of travel to the more major facilities and job opportunities in the conurbation.

This problem cannot be mitigated by additional public transport investment. Badly-located new housing encourages road expansion, increases the distance travelled by car and undermines sustainability. Across the region we risk locking people into badly located homes for generations.

Conclusions

The Government Policy Statement of 16 December 2020 signalled a change in direction, away from maximising house building irrespective of its location to directing homes to where they are most needed and most sustainable. But this positive aim has not been backed up with changes to the planning system.

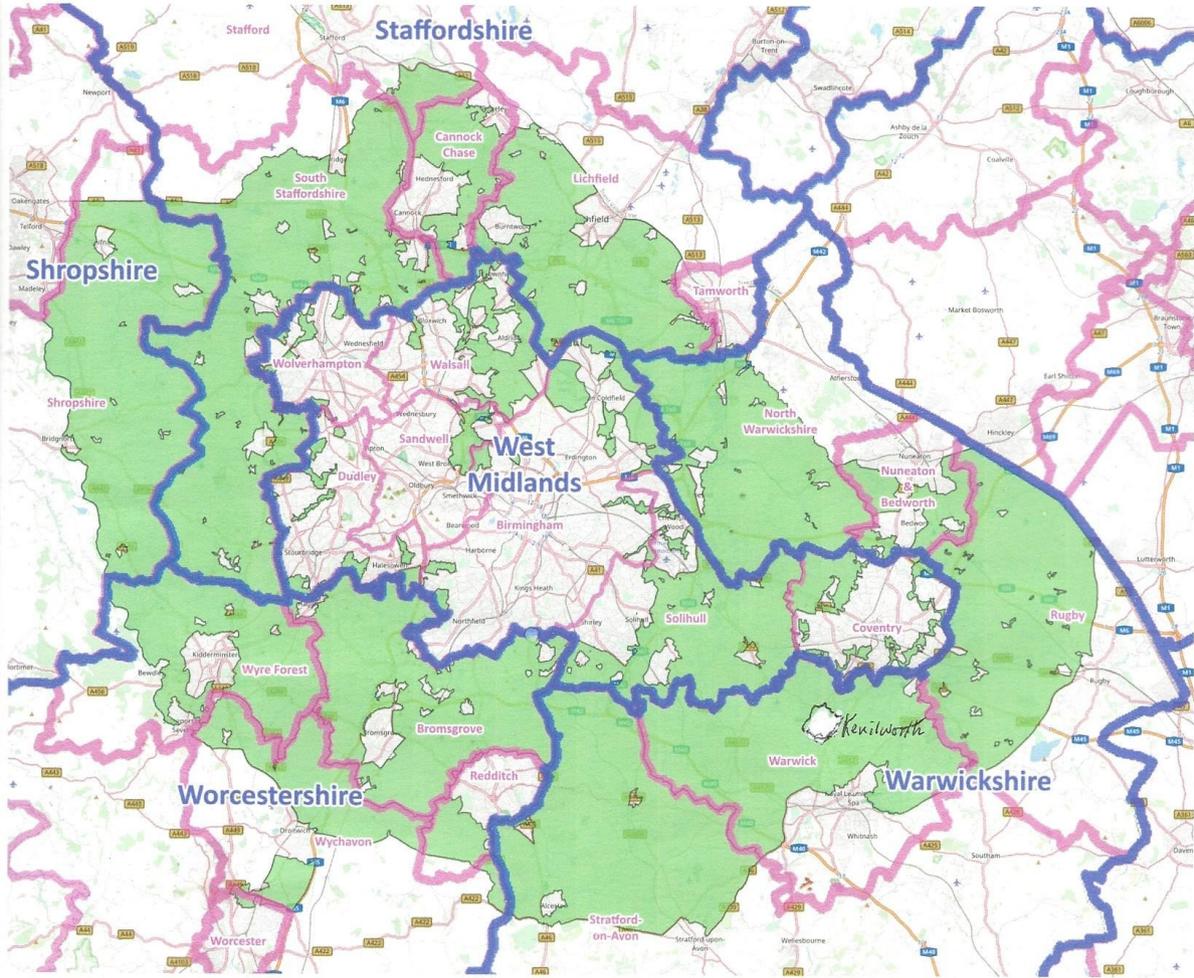
Instead, the West Midlands countryside, and particularly the Green Belt, is under sustained assault from the very system that is meant to protect it. Decisions being made now will lock in future choices.

The level of development threatened in the Green Belt also runs a high risk of weakening urban regeneration efforts across the Combined Authority area, including the pre-COVID goal of delivering 80% of development on Brownfield Land.

This issue is now pressing. We urge you to pick up the baton for sustainable development and promise, as the Mayor of the West Midlands, to ensure that the processes to determine housing numbers which local planning authorities are required to follow are changed to deliver sustainable development.

We ask you to use the powers and status that your post gives you to support a clear change to policies supporting more housing in urban areas, and end the serious attack currently faced by the countryside all around the West Midlands conurbation and Coventry.

Mark Sullivan
MRTPI CMILT
Chairman
Campaign to Protect Rural England
West Midlands Region
41A Smith St, Warwick CV34 4JA
Tel 01926 494597 / 07742 809 930
e-mail: plans_cp_re_warks@outlook.com



The West Midlands Green Belt

County Boundaries - Blue District and Borough boundaries - Pink