



The  
countryside  
charity

**West Midlands region**  
From the vice-chairman

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Walsall Local Plan Objection

Campaign to Protect Rural England (West Midlands)

December 2025

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## Introduction

West Midlands CPRE is very concerned about the impact on the environment, landscape and amenity Walsall Local Plan, as well as the large and, we consider, excessive loss of protected green belt, very little of which classifies as grey belt.

As a hybrid/issues and options regulation 18 consultation we consider the current process for interested parties to respond.

This is made worse by the lack of up-to-date evidence on transport, site specifics and environmental, landscape and amenity impacts.

We specifically:

1. disagree with the level of green belt releases given the potential from increased supply from 1. windfalls, 2. reviewing density.
2. ask for urgent work on an agreement with Birmingham Council to accept some of Walsall's housing need before the Plan progresses.
3. seek a specific strategic policy to address climate change, including where development is located.

This response is supported by a technical report we commissioned from Gerald Kells to examine Walsall's housing evidence as well as his report identifying additional relevant supply in Birmingham.

## **Specific Policies**

### **Spatial Strategy Policy 1: Overall Strategy**

We do not think Option E represents a sustainable approach because there is additional relevant housing supply within the Borough and in Birmingham. Before the next stage the council should

1. reassessment the small and large windfall calculation

As our supporting report explains the current approach underplays the number of likely windfalls.

2. examine the opportunities higher densities.

The proposed policy on densities is higher than assessed and that Option E assumes consistently low densities on green field sites. A surprisingly high amount of land is also allocated at Sandhills compared to what is developed which cannot find explained. Subject to strong design principles there is a case for higher densities on many sites.

Walsall should also urgently seek additional housing supply from Birmingham Council taking account of their significant (and currently, in our view, undercounted) surplus of housing supply.

Walsall Council should then reassess the need for so many highly damaging Green Belt housing releases.

This should specifically include the removal of the sites which impact directly on the Arboretum Park and its surroundings which are so important to the Borough.

### **Spatial Strategy Policy 2: Making Efficient Use of Land**

CPRE welcome the reference to densities, but this is in the context of our comments on Policy 1

We welcome the reference to Climate Change. However, this should not simply be a reference to Chapter 12 but Climate Change Policy 1 should be moved to the Strategic Policies and tightened up to include reducing the need to travel.

### **Housing Policy 1: Overall Housing Need**

We support this approach (taking account of our comments on Spatial Strategy Policy 1). We do not consider there is any justification for a figure above the Standard Method calculation which already provides more housing than is sensibly justified. However, we urge the Council to pursue urgent discussions with Birmingham and other authorities, such as Telford & Wrekin, to meet some of Walsall's need.

#### **Housing Policy 4: Density**

As already said, we support the general approach to density, but it is currently not followed through in the allocations, and specific work needs to be done to ascertain potential density uplifts which could be achieved within strong design guidelines.

#### **Centres Policy 6: Housing**

CPRE supports the approach to housing in centres, which could form a significant and separate additional housing supply or justify an uplift in the windfall calculation.

#### **Transport Policy 1: Vision**

We support this vision for transport but worry that the spatial approach will fail to deliver on this because of poor transport links to green field sites.

#### **Transport Policy 2: New Development**

Further comment on Transport Policy 2 is difficult until the Transport Assessment is provided to show how the mitigation of transport impacts of major developments will be addressed but we are concerned that there will be very significant impacts, including at the very large Mellish Road sites.

#### **Green Belt Policy 1: Boundaries**

CPRE supports the thrust of this policy but note that we do not consider current proposals to remove sites from the Green Belt justified.

#### **Green Belt Policy 2: Landscape**

We support this policy. If development in the Green Belt does go ahead it is vital that it respects the landscape but without an up-to-date landscape assessment to underpin the Sustainability Appraisal it is hard to properly assess the impacts.

#### **Climate Change Policy 1: Strategy**

As said on Spatial Strategy Policy 2 we consider this should be a strategic policy amended to reduce car dependency.

#### **Natural Environment Policy 1: Nature Conservation**

CPRE support this policy. However note that (d) contradicts the location of strategic sites in the plan which interrupt key nature corridors.

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

### **Historic Environment Policy 5: Landscape**

CPRE support this policy but it seems in contradiction to extensive allocations round the Arboretum extension and at other sites with high landscape value.

### **Historic Environment Policy 6: Parks**

CPRE support this policy but it seems in contradiction to extensive allocations round the Arboretum extension.

### **Policy EN7: Great Barr Hall and Estate and the former St. Margaret's Hospital Housing Numbers**

CPRE agrees that there is a need to retain the policy controlling development on the Great Barr Hall estate. However, note that any enabling development in the estate would add to the overall housing numbers and provide further windfall delivery in the Borough.

*P.W. King*

Chairman, CPRE Worcestershire