

Strategic Planning – Bromsgrove District Council
Parkside
Market Street
Bromsgrove
Worcestershire
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Our ref: 60637/01/JK/MJP/40925273v1

To Whom It May Concern

Written Representations to the Wythall Neighbourhood Plan Regulation 16 Consultation

Introduction

These representations to the Wythall Neighbourhood Plan (“WNP”) Regulation 16 Consultation have been prepared by Lichfields on behalf of St Philips Land Ltd (“St Philips”).

We focus on the strategic matters which are contained within the WNP and relate specifically to St Philips’ land interests at Land at Hollywood Golf Course (“the Site”). An Aerial Site Plan (Annex 1) and Vision Document (Annex 2) have been appended to these representations to aid Wythall Parish Council’s (“the Council”) consideration of the site.

As outlined in the National Planning Policy Framework (“NPPF”) (2024), Neighbourhood Plans should not promote less development than, nor undermine, the area’s strategic policies (Paragraph 30) and must be in general conformity with the development plan’s strategic policies for that area (Footnote 17).

St Philips welcomes this consultation and the opportunity to comment on the proposed Neighbourhood Plan.

The Site

The Land at Hollywood Golf Course measures approximately 38.3 hectares (ha) in size and is located adjacent to Hollywood. Within Bromsgrove District Council’s settlement hierarchy review – as part of the District’s ongoing Local Plan review – Hollywood (alongside Wythall) is designated as a Tier 2 Large Settlement. Hollywood/Wythall score particularly well in respect of retail, education and community. In this regard, the settlement is considered to be a sustainable location for housing growth.

The site itself comprises an existing private golf course and associated buildings. The boundaries of the site are defined by tree planting to the north and east; existing residential properties along the Fordborough, Windrush Road and Hollywood Lane to the south-east; and tree planting along

Hollywood Lane and Alcester Road to the south and west. A Public Right of Way (PRoW WO:736 and WO:657) runs to the east of the eastern site boundary, which represents the only public access to the site.

Bus stops are located on Alcester Road and Hollywood Lane offering regular services to Redditch, Hockley Heath, Birmingham and Solihull. Wythall and Whitlocks End rail stations are located approximately 2km south and 2.3km east of the site respectively, offering services to Birmingham Snow Hill, Stratford-upon-Avon and Stourbridge.

A small local centre containing a Tesco Express is located on the Hollywood Lane/Alcester Road junction. Small and large-scale retail facilities are located within approximately 800m of the site. Primary and secondary schools are located within approximately 800m and 1,200m north and south of the site (respectively).

It is envisioned that the site would deliver approximately 650 dwellings, making provision for market and affordable housing in a range of tenures and sizes. The site would deliver attractive areas of new public open space. These spaces will be linked by a series of green corridors, with provision made for recreation, formal play, new and existing planting, biodiversity enhancement and attenuation. As demonstrated in the Vision Document, there is also potential for a new primary school to be provided on site.

The development would promote the creation of a safe, attractive and distinctive place where people aspire to live. In this context, St Philips would encourage Wythall to consider the land at Hollywood Golf Course for housing allocation in the WNP.

Bromsgrove Development Plan 2011-2031

In the adopted Bromsgrove District Plan 2011-2030 (adopted January 2017), the District recognised a need for housing growth of 7,000 homes across the Plan Period to 2031.

Policies BDP3 (Future Housing and Employment Growth) and BDP4 (Green Belt), the District projected the need for 4,700 homes to be built by 2023, and then a Green Belt Review to be carried out in order to develop a further 2,300 homes released from the Green Belt.

The Council acknowledged that these remaining 2,300 homes could not be delivered across the District without altering Green Belt boundaries. The result of which is therefore an identified and incumbent need for emerging planning policies to accommodate new housing growth through the release of land from the Green Belt.

Previous Representations: Bromsgrove District Council's Draft Development Strategy Public Consultation (2025)

In October 2025, Lichfields prepared representations on behalf of St Philips for Bromsgrove District Council's Draft Development Strategy consultation ("Bromsgrove DDS"), focusing on strategic matters relating specifically to St Philip's land interests at Hollywood Golf Course.

Within these representations, we raised St Philips' concern in relation to Bromsgrove's approach to housing growth. In particular, issues were raised concerning a lack of evidence underpinning Bromsgrove's spatial strategy, taking into account the need to assist with the unmet needs arising in the

Greater Birmingham and Black Country Housing Market Area (“GBBCHMA”) and seeking a Green Belt Assessment (that has regard to grey belt land) and an updated Housing and Economic Development Needs Assessment (“HEDNA”), all of which would be relevant factors to the WNP.

In the Bromsgrove DDS, this Site was assessed under Ref: 199 in the ‘Site Assessments: An Assessment of Submitted Development Sites – Output Summaries’. The Site scored well against criteria such as site size, noise, proximity to the existing settlement, flood risk and ancient/veteran trees; the site assessment determined that “there are a few limited constraints associated with this site. Those that have been identified are very likely to be capable of mitigation at planning application stage or through policy provision as part of a local plan allocation”.

Furthermore, it is noted that the Council’s assessment also states that “the site promoter has addressed the issue regarding loss of Open Space, which is no longer considered a barrier to development.”

In the Bromsgrove DDS, published Summer 2025, the District Council recognised a need to allocate enough land for 12,155 homes in order to meet their local housing need. The DDS acknowledged they have enough land for 3,000 homes identified through planning applications and large site allocations, however, need to find additional land for just over 9,000 homes. The Bromsgrove DDS recognises Wythall as *“one of the large, sustainable settlements... making it appropriate for future development allocations”*, anticipating potential contributions of 1,235 dwellings. Thus, the WNP should make **allocations to contribute to addressing the District’s needs, as well as those of the GBBCHMA.**

The housing needs of the GBBCHMA are similarly stark and significant. There is a large quantum of unmet housing needs arising from the GBBCHMA, of which Bromsgrove is a part. The DDS will consequently need to make provision for these needs in part. As raised in previous representations to the Bromsgrove DDS in October 2025, St Philips reiterates its concerns that the DDS does not make any reference to helping to meet the needs of neighbouring authorities. The NPPF has re-emphasised that local planning authorities must cooperate to identify and meet housing needs within their housing market area (Paragraphs 11b and 36a), supported by relevant and up-to-date evidence (Paragraph 36b). Yet this is absent in both the Bromsgrove DDS and WNP.

Research published by Lichfields (**‘Planning Prospectus for Growth’** [January 2025], Annex 3) identified that based on available information, there is an emerging unmet housing need of approximately 42,800 dwellings up to 2042. **Importantly, the ‘available information’ from Local Plans currently under preparation across the GBBCHMA (and beyond) indicates that there are only ‘committed’ contributions totalling 6,200 dwellings up to 2041.** This could be reduced to c. 4,200 if some of these plans do not proceed as envisioned. It is therefore clear that the current level of contributions from neighbouring authorities is insufficient to meet the existing shortfall.

Within this context, therefore, the parishes and Neighbourhood Plan Areas across Bromsgrove should recognise their role in addressing these District-wide – and, indeed, GBBCHMA-wide – housing needs through appropriate housing allocations in their plans.

Bromsgrove and Wythall’s Housing Needs

This drive to tackle the local housing shortage did not materialise, however. Bromsgrove District **Council’s latest Housing Land Supply 2011-2025 (2025)** shows that the District only has a 2.24 year supply of deliverable housing land and identifies that 858 dwellings need to be provided in the district

per year over a five year period. The report, however, shows that only 256 dwellings were completed in the District in 2024/25 – significantly falling short of the target. Over the last 10 years, the District saw an average delivery rate of 305 dwellings per annum, with just 125 dwellings completed in 2023/24. **As these figures indicate, Bromsgrove’s housing shortage is persistent and significant.**

It is clear that the housing crisis facing Bromsgrove is acute. For example, the Government’s most recent Housing Delivery Test (2023), which considers the number of homes required in 2020/21 – 2022/23 (1,303) against the number delivered (645), indicates that Bromsgrove has only delivered 50% of the total number of homes required in this period. This is the third lowest figure of any authority in the Midlands.

As a result, this triggers the ‘presumption in favour of sustainable development’ as set out in the NPPF. These stark statistics reaffirm the vital importance of supporting sites which will help deliver these **targets and meet Bromsgrove’s steeply increasing housing need.**

The need for the delivery of new homes is further acknowledge through the evidence base supporting the WNP. In this respect, AECOM were commissioned to prepare a Housing Needs Assessment (“HNA”).

The HNA identified that 324 dwellings have been built in Wythall between 2011-2022, with 204 of these dwellings completed between 2016-2022. Of these 204, just 64 dwellings were affordable (31.4% of new housing in Wythall). The HNA states that at the time of its publication, Wythall did not have a formal **housing requirement due to the ongoing review of Bromsgrove’s emerging plan. Thus, the WNP does not assert a housing requirement for the Neighbourhood Plan Area.**

Drawing upon pro-rated data from Bromsgrove’s HEDNA (2022), the HNA asserts a need for 383 dwellings per year across Bromsgrove District, totalling 6,511 dwellings over the seventeen-year plan period. **For Wythall, calculated to be 12.3% of the District’s population at the time, 801 dwellings are** stated as required for the Neighbourhood Plan period 2023-2040, equating to 47 dwellings per annum. This rate of delivery exceeds that of 2011-2022 which saw circa 29 dwellings delivered per annum in Wythall.

In addition, the HNA posits a need for 11 affordable homes per annum, or 193 homes across the Neighbourhood Plan period (2023-2040). The HNA calculates that, assuming an affordable delivery rate of 40%, 483 dwellings would therefore need to be built in Wythall across the plan period so as to facilitate their delivery. The HNA and the WNP note that the Parish faces challenges of housing affordability, with the median house price of all homes rising by 45.6% in the intercensal period.

However, as the above demonstrates, there is a contradiction between the housing requirement in Wythall and the District. Whilst St Philips recognises there has not been a formal housing requirement for the Plan Area, it is argued that a more accurate one should be put forth in the WNP, to adequately address the sharp increase in local housing need for the District, and subsequently, the Neighbourhood Plan Area.

Since the publication of the HEDNA and HNA, Bromsgrove’s LHN figure has significantly increased in light of revisions to the NPPF and the requirement of the Standard Method. St Philips contends that the WNP should reflect the latest housing need for the District, to accurately acknowledge **the Plan Area’s housing needs. The District’s LHN figure is now 715 dwellings per annum. Across a seventeen-year plan**

period, this equates to 12,155 homes (without including a buffer) or any growth associated with meeting cross boundary housing needs from the Greater Birmingham and Black County Housing Market Area (GBBCHMA).

Based on the 2021 Census data, showing Bromsgrove’s population at 93,637 and the WNP’s Plan Area at 12,269, the population of the Neighbourhood Plan area has grown to now comprise 13% of the District. Based on this 13%, therefore, the need for the Neighbourhood Plan Area rises to 1,580 dwellings, or 93 dwellings per annum up to 2040. Yet the WNP makes no provisions for such housing needs.

St Philips therefore encourages the Parish to reassess local housing needs, within the present context, so as to adequately address current and future needs of the Neighbourhood Plan Area. In the absence of the WNP defining housing need and including land to meet the delivery of new homes, the WNP is unlikely to be found sound at Examination in Public and would fail to be in conformity with either the BDP or national policy.

Importantly, the WNP lacks allocations to meet the identified housing need, and thus, is not afforded Paragraph 14 protections. Paragraph 14b of the NPPF requires that Neighbourhood Plans contain **“policies and allocations to meet its identified housing requirement”**. In areas where there is no five year housing land supply and the neighbourhood plan does not include allocations, the ‘tilted balance’ (Paragraph 11d of the NPPF) is engaged, under the presumption in favour of sustainable development. St Philips therefore encourages the Council to allocate suitable sites across the Neighbourhood Plan Area, such as the Hollywood Golf Course, so as to meet housing requirements.

Wythall Neighbourhood Plan

WYTHALL 1 – Local Community Facilities

This policy applies to various community facilities (in Use Classes F1, F2 and Sui Generis) across the Neighbourhood Plan Area; the Site is one of these facilities, under Ref: 49. The Policy states that for applications proposing to remove an existing community facility, the application should demonstrate that:

- a) *“Equivalent alternative provision exists within the relevant village, or will be provided; or,*
- b) *It can be clearly demonstrated that the facility is no longer needed. To demonstrate lack of need, developers should submit evidence that all reasonable efforts have been made to market the site/facility for its current use without success over the preceding 12 months.”*

St Philips challenges this policy for being too restrictive and inhibiting development on suitable, deliverable sites. Point a) requires that **“equivalent alternative provision” must currently exist in the village** – as opposed to elsewhere in the Neighbourhood Plan area, or even the wider district. There are three golf courses and a driving range within the Neighbourhood Plan area. The Fulford Heath Golf Club is only 2.4 miles south of Hollywood Golf Course, and the Kings Norton Golf Club is just 3.3 miles southwest of the site, close to the club in Fulford. These two golf courses are merely a 7 minute drive from the Hollywood Golf Course, but due to the restrictive language in Wythall 1 – requiring alternate **provision “within the relevant village”** – these clubs may not be accepted as suitable alternatives. This is unreasonably restrictive.

Moreover, the wording in Wythall 1 does not align with that in the adopted Local Plan. Policy BDP25 (Health and Wellbeing) of the adopted Bromsgrove Local Plan stipulates that Bromsgrove District Council will support proposals that protect, retain or enhance existing sport, recreational and amenity assets. BDP25.3 states that the loss of existing outdoor open space, sport and recreation facilities will not be permitted unless there is up-to-date evidence that:

- a) *“There is a proven surplus of provision, and the site is no longer needed, or is unlikely to be required in the future; or*
- b) *The benefit of the development to the community outweighs the harm caused by the loss of the facility; or*
- c) *An alternative facility of an equal quantity and quality or higher standard will be provided in at least an equally convenient and accessible location to serve the same local community.”*
(Emphasis added)

The Policy goes on to say, under BDP25.4, that in such circumstances where there is a loss, Bromsgrove would require compensatory measures, such as financial contributions or improved facilities.

As the emphasis above shows, the wording in the Local Plan policy includes a caveat for proposed schemes that offer wider community benefits outweighing the harm caused by the loss of the facility; no such caveat is contained in the WNP policy. Instead, the WNP only offers the limited options of delivering an equivalent facility in the same village or marketing the golf course for 12 months – neither of which seem feasible within the settlement of Wythall / Hollywood.

Whilst St Philips broadly supports the provision of adequate open space and outdoor sports facilities, as in line with national policy requirements, this does not extend to protecting private golf courses from development. Bromsgrove District Council have allocated land at Bromsgrove Golf Centre as a potential housing site to meet the local housing need in the DDS. Despite the Golf Centre being in the Green Belt, **this draft allocation indicates Bromsgrove’s priorities in transforming these types of land uses for wider housing benefits.** As Bromsgrove have noted in their Open Space Study (2022), Outdoor Sports Facilities do not include private golf courses. Paragraph 5.3.4 stipulates:

“Private Golf courses and golf driving ranges with limited public accessibility have been excluded from Local Standards relating to Outdoor Sports Provision since they have limited public accessibility.”

The Site in its current form is not publicly accessible and thus, residents are unable to benefit from the health and wellbeing of enjoying the open green space unless they purchase a membership at the golf course club.

The private nature of the golf club undermines its labelling as a “community facility” as it is not accessible for the majority of the community. St Philips therefore challenges the idea that Hollywood Golf Course should be considered a “community facility” afforded protection under WYTHALL 1.

Instead, using the Site for residential development would facilitate the necessary public open space requirements, so as to meet the Golden Rules (Paragraph 156 of the NPPF), offering ***“the provision of new... green spaces that are accessible to the public”***. These wider benefits would be supported by Local Plan Policy BDP25.

The benefits to the wider community, weighed up against the harm of losing a golf course, has been subject of several planning appeals. Appeal APP/Q1825/W/24/3350905 was allowed, granting planning permission for residential development and associated infrastructure partially on a golf course in Redditch in February 2025. One of the main issues at the centre of the debate had been the loss of open space and whether new housing was sufficient justification to do so. The Inspector recognised that the golf course was a private facility, offering no formal public access. Whilst it was acknowledged that a development of 214 homes would result in the loss of green space, the development proposed over 3 hectares of *publicly* accessible space and play areas, in an area lacking such provision. This appeal **further highlighted that the development would contribute to addressing Redditch’s housing needs**, with a housing land supply position of just 2.8 years. The Inspector concluded that the contribution to housing supply **attracted “very significant weight”**. **Finally, the Inspector concluded that the adverse impacts of this development attracted limited weight whilst the benefits attracted significant weight.**

Additionally, another Appeal Decision (APP/Z3825/W/24/3355546) further emphasised the planning balance when determining an application for the loss of a golf course, this time in Horsham in July **2025. In the Appeal Decision’s conclusion, the Inspector has given “very substantial weight” to the 800** new homes in an authority with just a 1 year housing land supply position and a Housing Delivery Test score of 62%. Bromsgrove District is in a similar position. Amongst other benefits, the Inspector again concluded that the benefits of the scheme outweighed landscape harm and associated policy conflicts.

St Philips draws attention to the above Appeal Decisions so as to reiterate the appropriate response to the loss of private golf courses, and how this decision can be weighed up against a poor housing land supply and high local housing need.

Thus, in the WNP, St Philips contends that it would be more appropriate that Wythall 1 be caveated with the requirement to demonstrate need for the type of development proposed, and that this need can demonstrably outweigh the value of the land as an open area. Then, the planning balance can be engaged with, allowing developers to highlight the benefits of such a scheme and the local planning **authority can consider the proposed development’s merits in a District-wide context.**

The benefits of developing this site for residential homes is clear, particularly within the context of the **Neighbourhood Plan Area’s and wider District’s housing needs.**

Green/Grey Belt

In addition, the WNP should look to identify land within the Neighbourhood Plan Area that would be appropriate for Green Belt release, to support the District Council in its aims of releasing Green Belt sites for development.

At present, the WNP makes no reference to ‘grey belt’ as a concept nor does it highlight sites which could meet the definition. This may expose the Neighbourhood Plan Area to uncertain, speculative development applications across the Parish. Instead, St Philips encourages the WNP to conduct their own Green/Grey Belt Assessments, capturing appropriate land – such as the Site at Hollywood Golf Course – for housing growth.

To assist the Parish Council with identifying whether the Site could be considered as grey belt, St Philips has undertaken a high-level assessment of the Site's contribution to Green Belt purposes A, B and D (as per Paragraph 143 of the NPPF), showing that the Site does not strongly contribute to any purposes:

- *Purpose A - to check the unrestricted sprawl of large built-up areas: Moderate Contribution*

The release of the site would not result in the sprawl of a large built-up area as long as separation is maintained from the Birmingham conurbation. The site has clearly defined boundaries with Alcester Road, Hollywood Lane (and existing development) and existing tree line and hedge. To the north, the site is bordered by an existing tree line, beyond which is an agricultural field and existing residential development.
- *Purpose B - to prevent neighbouring towns merging into one another: Low Contribution*

The adopted Bromsgrove Local Plan maintains that Bromsgrove is the only 'town' in the District, as per Paragraph 8.5 in the supporting text to Policy BDP2. Thus, aligning with the PPG, this Site does not merge with the town of Bromsgrove. Notwithstanding this, development would not extend past the watercourse which runs through the Site. The scheme would be appropriately landscaped to ensure separation is maintained between the urban edges.
- *Purpose D - to preserve the setting and special character of historic towns: Low Contribution*

The Site does not contribute to preserving the setting of a historic town.

As the above assessment shows, the Site does not strongly contribute to purposes A, B or D. There is no **'strong reason' for restricting development (in respect of NPPF Footnote 7)**. **The site should consequently be identified as grey belt land through the Council's Green Belt Assessment.**

Furthermore, St Philips considers that the release of the site would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole. In respect of Purpose C, the release of the site for development would result in the loss of undeveloped land from the Green Belt. Notwithstanding this, based upon the MHCLG Local Authority Green Belt Statistics 2023, the total Area of land designated as Green Belt in Bromsgrove District is 19,290 ha. The land at Bromsgrove Golf Course includes 38.39 ha. The site represents a very small proportion of the Green Belt within the District and development of the site would result in the loss of 0.19% overall of the retained Green Belt within the District. Additionally, the Bromsgrove DDS acknowledges the need for Green Belt release, stating that **"the settlements in Bromsgrove district have such tightly drawn Green Belt boundaries and there is limited non-Green Belt land available to meet our LHN"**. Therefore, for the WNP to align with **Bromsgrove's emerging Local Plan, St Philips recommends that this Site be included as a housing allocation in the WNP.**

Test of Soundness

Development Plans, including Neighbourhood Plans, need to pass tests of soundness, as per Paragraph 36 of the NPPF. St Philips contends that the WNP falls short of being found sound for the following reasons:

- 1 Despite a significant housing need across the District, with a sharp rise in the local housing figure, the WNP makes no allocations **to meet the area's needs, nor does it acknowledge the needs of the GBBCHMA**. The HNA identifies housing need across the Neighbourhood Plan Area, but the WNP does not acknowledge these needs (in conflict with Paragraph 36a); and
- 2 **The WNP has labelled a private golf course a “community facility”, affording it protections against development under proposed Policy WYTHALL 1, despite the fact it is *not* publicly accessible and does not serve the community**. Whilst this label is not a formal designation grounded in a statutory or policy basis, the WNP still purports to essentially safeguard these sites from development, with restrictive caveats that are unjustified and do not support the adopted Local Plan (in conflict with Paragraph 36a and 36b).

Although the WNP claims to meet the ‘basic conditions’, as set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), St Philips asserts that to ensure a sound, deliverable strategy, it is recommended that the Parish Council revise the WNP so as to include appropriate housing allocations, such as this Site at Hollywood Golf Course, and to discount Hollywood Golf Course from its list of community facilities, to be removed from WHYTALL 1’s protections.

Concluding Remarks

As set out in these representations, St Philips encourages Wythall Parish Council to review WYTHALL 1, amending the policy so it aligns with the Local Plan and national policy, so as to enable much-needed housing developments to be proposed on appropriate sites. Critically, Hollywood Golf Course is a private golf course that is not accessible to the wider community. As such, it cannot logically be identified through the Neighbourhood Plan as a “community facility”.

St Philips also recommends the Council update their anticipated housing needs for the Parish, **accounting for Bromsgrove’s increased LHN and the impact this will have across the District and Parish.**

Housing growth is needed in the Neighbourhood Plan area, to accommodate both local and District-**wide current and future housing need. The District’s housing** requirements will need to be distributed through the settlement hierarchy, and Hollywood/Wythall is in the second tier of such hierarchy. The WNP should therefore, make provisions for such levels of growth, as in line with the latest available housing needs evidence. Housing allocations, including identifying sites for Green Belt release, is recommended in order to meet these needs.

We trust that these comments will be taken into consideration during the preparation of the WNP and also as part of any future independent examination of the Plan. We also wish to be kept informed of the next steps in the process. Indeed, should there be any opportunity to do so, St Philips would welcome the opportunity to contribute further to that examination and would be happy to provide any further information if required.

LICHFIELDS

Yours faithfully



Meghan Jenkins-Paterson

Planner

BSc (Hons) MSc



Annex 1: **Aerial Site Plan**





Annex 2: Vision Document

Hollywood Golf Course

Vision document

Vision | July 2023



ST PHILIPS

Introduction



Vision

The vision for the site seeks to make best use of its unique range of existing assets, which provide the opportunity to organically shape the layout of development; prompting the creation of a distinctive place that has emerged from its inherent character, rather than being imposed upon it.

The development will seek to integrate positive elements of the character of the surrounding built form to deliver a responsive and high quality aesthetic.

Varied, attractive and ecologically abundant public open space and a new primary school will promote a healthy and happy community and aid social interaction.

Concept

This Vision Document has been prepared by St Phillips Ltd to support the proposals for a residential-led, mixed-use community on the site of the existing Hollywood Golf Course.

This document is submitted in support of representations that promote the allocation of the site for residential development through the Bromsgrove District Council Local Plan Review.

PLANNING CONTEXT

The opportunity associated with the site has been previously shared with Bromsgrove District Council in 2017.

This updated Vision Document has been prepared in response to the movement towards sustainable development, as embodied within the National Planning Policy Framework.

Best practice has progressed with a focus on:

- Connectivity
- Sustainability
- Nature and Landscape
- Social and Community Infrastructure

Therefore, in order to promote the site with these key principles at the forefront, an updated Vision Document has been created with a focus on the above categories.

Principles

Key principles for the development are:

1. Work with the site's existing assets including woodland, water features and topography.
2. Break down the perceived mass of development through the use of green and blue corridors.
3. Create variety through diverse character areas.
4. Prevent coalescence with Birmingham to north and consider sensitivity of the eastern boundary.



Legend

Site boundary (38.3ha)

Land use

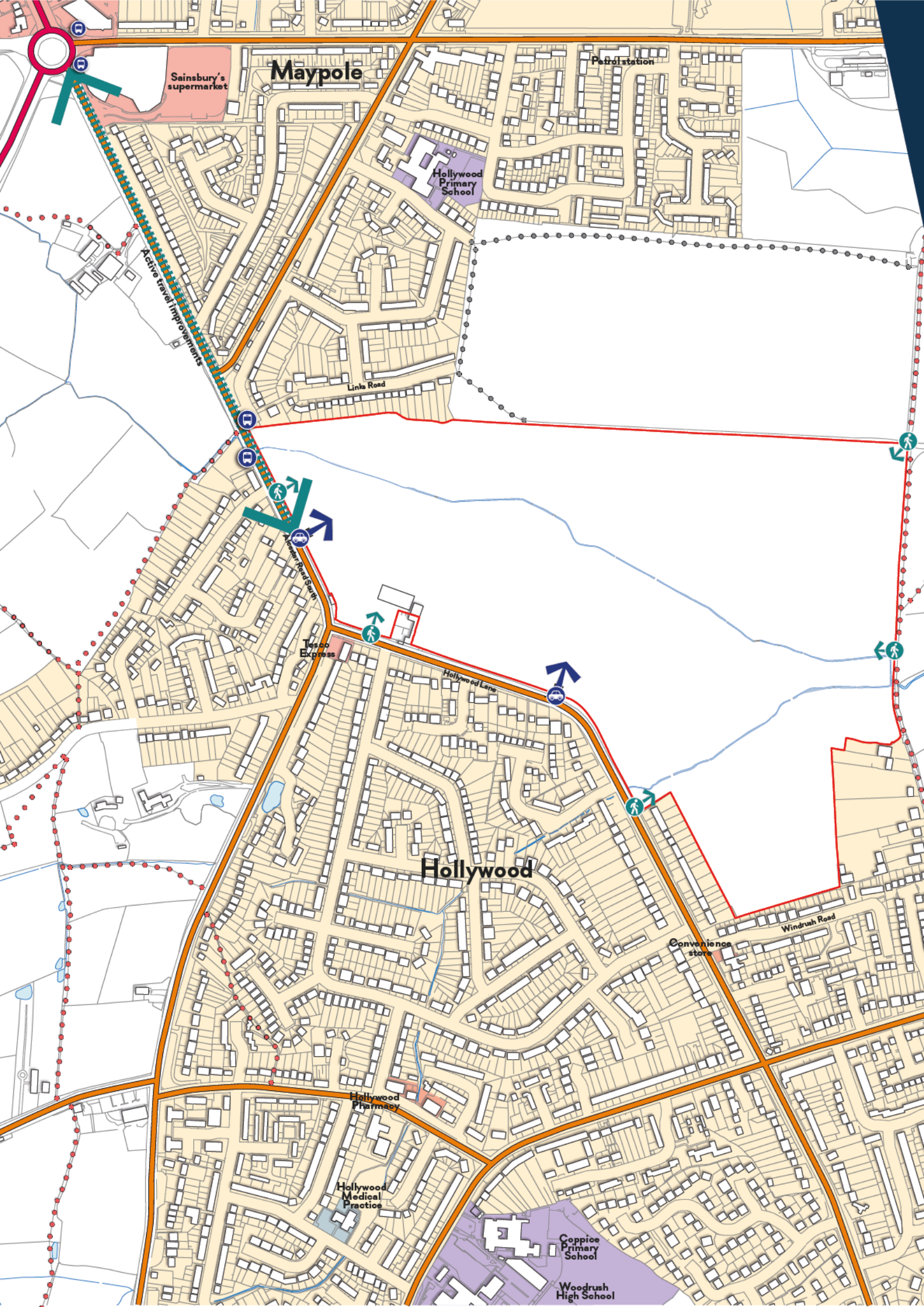
- Residential development (7.66ha: 620-700 dwellings at c.35-40dph)
- Potential land for primary school (1.5ha: single form entry primary school)
- Public open space (19.14ha: 50% of site area)

Landscape and ecology

- Retained woodland blocks
- Retained trees within developable area
- Drainage pond
- Existing watercourse

Access and movement

- All-mode access
- Pedestrian and cycle access
- Pedestrian access
- Principal street
- Secondary street
- Tertiary street / private drives
- Proposed strategic pedestrian connection
- Proposed footpaths
- Existing public right of way
- Existing footpath



Sainsbury's supermarket

Maypole

Patrol station

Hollywood Primary School

Linka Road

Active travel improvements

Wentworth Road

Taspo Express

Hollywood

Hollywood Lane

Windrush Road

Convenience store

Hollywood Pharmacy

Hollywood Medical Practice

Coppice Primary School

Woodrush High School

Connected Places

20 MINUTE NEIGHBOURHOODS

A transport strategy has identified that the site is well connected to the following local facilities, accessible on foot or by bicycle. The new community could therefore reflect 20-minute neighbourhood principles, allowing future residents to live sustainable, easy and fulfilled lives:

ACTIVE TRAVEL

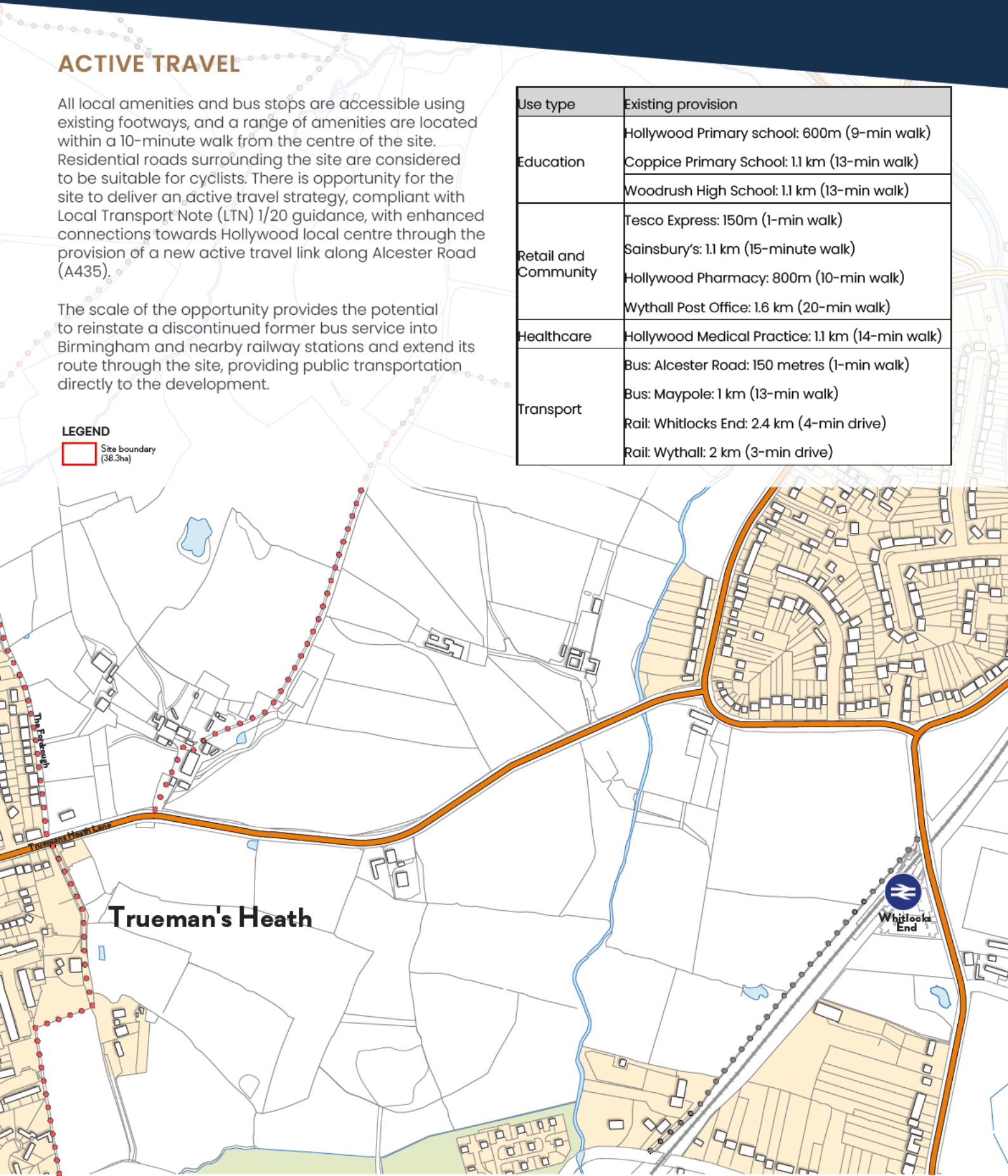
All local amenities and bus stops are accessible using existing footways, and a range of amenities are located within a 10-minute walk from the centre of the site. Residential roads surrounding the site are considered to be suitable for cyclists. There is opportunity for the site to deliver an active travel strategy, compliant with Local Transport Note (LTN) 1/20 guidance, with enhanced connections towards Hollywood local centre through the provision of a new active travel link along Alcester Road (A435).

The scale of the opportunity provides the potential to reinstate a discontinued former bus service into Birmingham and nearby railway stations and extend its route through the site, providing public transportation directly to the development.

Use type	Existing provision
Education	Hollywood Primary school: 600m (9-min walk)
	Coppice Primary School: 1.1 km (13-min walk)
	Woodrush High School: 1.1 km (13-min walk)
Retail and Community	Tesco Express: 150m (1-min walk)
	Sainsbury's: 1.1 km (15-minute walk)
	Hollywood Pharmacy: 800m (10-min walk) Wythall Post Office: 1.6 km (20-min walk)
Healthcare	Hollywood Medical Practice: 1.1 km (14-min walk)
Transport	Bus: Alcester Road: 150 metres (1-min walk)
	Bus: Maypole: 1 km (13-min walk)
	Rail: Whitlocks End: 2.4 km (4-min drive)
	Rail: Wythall: 2 km (3-min drive)

LEGEND

 Site boundary (38.3ha)



Sustainability

Bromsgrove District Council supports the movement towards achieving sustainable development as presented within the emerging District Plan.

The policies listed below outline the aspirations of the Council to provide climate friendly, net-zero development.

- BDP16 Sustainable Transport – to deliver an improvement in accessibility by encouraging more sustainable means of travel and maximising the efficiency of the transport network in Bromsgrove District.
- BDP19 High Quality Design – to deliver high quality people focused space through 11 requirements referring to the use of appropriate tools and relevant guidance, sustainable construction and enhancing the character of the local area.
- BDP 22 Climate Change – The Council will deliver viable low carbon climate resilient developments through a number of measures including the adoption of suitable adaption methods, ensuring development are well-served by public transport and infrastructure, ensuring new developments follow energy and waste management hierarchies. Additionally, Policy BDP22 supports developments which incorporate zero or low carbon energy generation technologies.
- BDP23 Water Management – to tackle the risk of flooding, encourage developments to follow the water conservation hierarchy and ensure sufficient capacity of the sewerage system is available.
- BDP24 Green Infrastructure – improve connectivity, enhance the quality of and provide for the appropriate long term management of Green Infrastructure.
- BDP25 Health and Well Being – to tackle the underlying causes of health problems in the District and facilitate the provision of healthy lifestyles and healthy environments.



The development will strive to incorporate high quality, sustainable design. Material selection will endeavour to show preference to suppliers who operate responsible sourcing practices and have current environmental management certificates to ensure that all products have been obtained from sustainable sources.

DESIGN QUALITY



CLIMATE CHANGE



In efforts to reduce the overall carbon emissions associated with the development and to maximise the energy efficiency, there will be a robust 'fabric first' approach to the build specification. This will be achieved through building fabric improvements and specification of efficient mechanical and electrical services, including a number of measures to improve efficiency and performance.

As part of the development proposals, the design will also incorporate low carbon energy generation technologies. The development will use air source heat pumps (ASHP), which are a zero (on-site) emission heating and cooling strategy, to provide both space and water heating. The use of ASHP avoids the need to use other fossil fuel powered heating systems as ASHP are fully electric and can reach efficiencies of up to 320%.

In efforts to reduce waste throughout the construction process, a number of efficiency measures will be implemented, such as the use of standard material dimensions. Waste hierarchy principles will be followed during the construction process, with an emphasis on the re-use of materials where possible. Where materials cannot be re-used, they will be sent for recycling to a licensed waste contractor.

WATER MANAGEMENT

There will be an emphasis on reducing water use within the development once in operation. The sanitaryware and water consuming systems installed will be efficient and water saving, with reduced flow rates to drive down the water use by occupants. Where this is not possible, flow restrictors will be installed to limit water use of sanitaryware items. As part of the development, it will be ensured that the requirements of Approved Document Part G will be achieved, which sets limits on the amount of water use, per person, per day.

Nature and Landscape

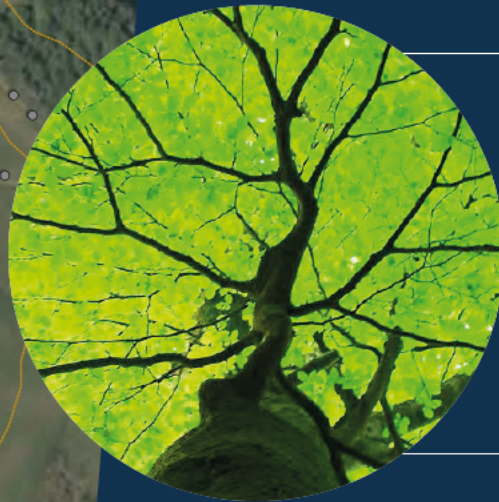
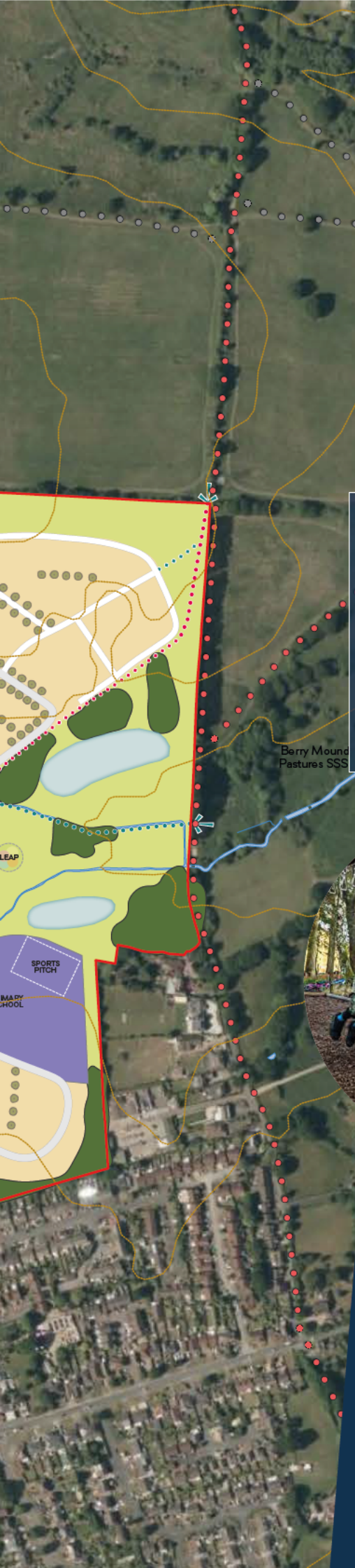
LANDSCAPE STRATEGY

The design of the scheme has been led by landscape, with key principles of retention and enhancement of landscape assets, including watercourses, hedgerows and trees actively moulding the masterplan, creating a truly organic layout, with a unique and distinctive character.

The development will offer expansive new areas of multi-functional public open space that are highly accessible for all residents from both within and around the site. This will include green buffers to the north and east, and large green corridors running through the centre of the site, breaking down the overall mass of development and providing space for a range of habitats, from wetland environments, wooded areas, wildflower meadows and areas of open space for recreation.

New tree planting will further assimilate the scheme into the existing landscape and aid the creation of an attractive and high-quality public realm. High quality footpath connections will be provided through the site and into the wider public right of way network.





Existing habitats

The site is dominated by modified grassland and blocks, pockets and lines of woodland cover, including broadleaved and coniferous trees. Wherever possible this tree coverage has been used to structure blocks and provide a framework of existing mature street trees on streets and spaces.

New habitats

The proposals will seek to retain and enhance positive features wherever possible and augment the biodiversity of the site through new, more ecologically abundant habitats to deliver a minimum 10% biodiversity net gain. This will include identifying areas for food growing, wildflower planting and wetlands.



Recreation

Space will be identified for a range of formal and informal recreation opportunities, from children's play, through to trim trails and woodland and wetland walks. The form of recreation design is proposed to adopt a naturalistic approach, in keeping with the character of the site.

Water and drainage

The site's existing watercourses are an important asset. The area of flood zone is to be respected, with the wider landscape around it proposed to form a new wetland environment, with a series of drainage ponds of varied size creating an attractive and important feature of the site.



Social and Community Infrastructure

The site benefits from being located in a highly sustainable location in terms of existing social and community infrastructure. The proposed development would deliver housing in a location which not only supports but enhances the 20-minute neighbourhood concept, therefore providing a great opportunity to offer a high-quality of life for future residents.

The Bromsgrove District Plan recognises the importance of the provision of high quality, accessible open space, sport and recreation facilities in the right areas which can have significant benefits in relation to health, community cohesion and general wellbeing.

On the basis that the proposed development could deliver up to 700 dwellings depending on density, which would generate significant additional demand for primary school places. As such, a plot has been indicated within the site for the potential location of a new single form entry primary school in a position which is easily accessible by both the residents of the site itself and the wider community.

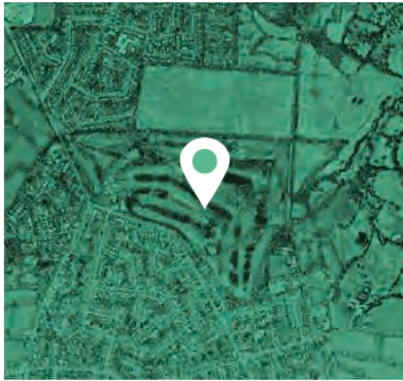
The proposed development would generate significantly greater patronage of the wide range of existing facilities, promoting a stronger local economy. The site itself would also contribute to its context, through providing a multi-functional network of spaces and recreational assets that would bring significant benefit to both the existing and new communities. As part of the overall open space strategy, two potential locations for sports pitches have been identified: within the school plot and within the area of public open space.

The proposed development will deliver new employment opportunities during the construction phase, which will offer local employment opportunity both through direct employment and indirectly through the increase in construction activity expenditure in local businesses.



The economic benefits of Hollywood Golf Club, Bromsgrove

The proposed development of up to 700 dwellings at Hollywood Golf Course, Bromsgrove offers the opportunity to stimulate economic growth, create jobs, and add to local authority revenues.



The proposal



700 New homes

Up to 40% Affordable housing

Other details:

The proposed development will also deliver a single form entry primary school that will stimulate local employment and economic growth.

Construction benefits



£125m
Construction value
(total construction cost)



£27.46m GVA
Economic output
(additional GVA p.a.)



184 Jobs
Construction jobs
(FTE jobs p.a. over the 10-year build period)



222 Jobs
Supply chain jobs
(indirect/induced 'spin-off' jobs supported p.a.)



Operational and expenditure benefits



£3.85m
First occupation expenditure
(spending to make a house 'feel like a home')



£1.5m
Resident expenditure
(within local shops and services p.a.)



18 Supported jobs
(from increased expenditure in local area)



Local Authority revenue benefits



£1.5m
Council Tax revenues
(p.a.)





CONNECTIONS INTO
WIDER AREA OF LAND
PROMOTION (L&Q)

STRATEGIC LAND RELEASE

Whilst the site clearly works effectively as a stand-alone development, providing sufficient space and diversity of offer to create a successful new community, there is also potential to work effectively with adjacent land, should a more strategic release of land be considered by Bromsgrove District Council.

The masterplan highlights how a well connected scheme could be created, with the neighbouring sites complementing one another, and with strategic connections through this site allowing access to key destinations, both within the site and in the wider context.



Summary

The Masterplan presented within this vision document shows how the scheme would create a sustainable and attractive new residential development that makes best use of its existing landscape assets.

It will ensure that the effects of development are limited and contained in a manner that makes an attractive and logical new edge to the settlement.

KEY BENEFITS

- A desirable new high-quality residential-led development, that benefits from the sustainable location of the site and that can deliver up to 700 new homes, in range of tenures and types.
- Opportunity for a new primary school in an accessible location which could serve the needs of this development, the existing population and potential adjacent development proposals to the north.
- An accessible development placed in a sustainable location, that offers transport choice to key facilities and local destinations, including the delivery of an active travel link between the site and the existing facilities in Maypole.
- High quality pedestrian connections into the wider public right of way network.
- A landscape led development, shaped by the site's abundant existing features, including tree coverage and watercourses to ensure a unique and site-specific character.
- Significant areas of multi-functional public open space, benefiting both the existing and proposed communities.



ST PHILIPS



Annex 3: Planning Prospectus for Growth



A Planning Prospectus for Growth

Embracing the opportunities of strategic planning and delivering growth
across the WMCA and beyond

LICHFIELDS

**Lichfields is the
pre-eminent planning
and development
consultancy in the UK**

**We've been helping create great places
for over 60 years.**

01 Introduction



My Government believes that greater devolution of decision making is at the heart of a modern dynamic economy and is a key driver of economic growth...

(Kings Speech 2024 – English Devolution Bill (July 2024))

The new Labour Government has emphasised that *“sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people.”* However, they recognize that delays within the planning system hinder this goal. To address these challenges, the Government recently reformed the planning system through a revised National Planning Policy Framework [NPPF], which included strengthening cross-boundary collaboration ahead of introducing mandatory mechanisms for strategic planning.

The Government has also reaffirmed its commitment to devolution, viewing it as a catalyst for economic growth. The English Devolution White Paper (“White Paper”) aims to empower Mayoral Combined Authorities [MCAs] with enhanced tools for strategic planning and economic development.

In the West Midlands, economic stagnation and declining productivity have seen Manchester outperform England’s second city. Housing delivery remains insufficient, exacerbating affordability challenges and failing to address the unmet needs of the Greater Birmingham and Black Country Housing Market Area [GBBCHMA]. Meeting these needs can not only provide much-needed housing but also drive sustainable communities and economic growth. This requires a stronger Duty to Cooperate [DtC] and a regional approach to addressing housing needs.

To capitalise on this opportunity, the West Midlands Combined Authority [WMCA] must adopt a strategic approach to planning, ensuring the WMCA’s housing and economic needs are met – likely in the wider housing market area [HMA] and beyond.

In this context, Lichfields¹ has prepared this Planning Prospectus for Growth for the WMCA on behalf of a Consortium of housebuilders and land promoters. This Prospectus, developed with informal technical and policy advice from Officers at Staffordshire County Council, aims to support the WMCA in grappling with distributing the unmet housing needs of the Black Country Authorities [BCAs], as the WMCA assumes strategic planning powers.

Importantly, the Consortium seeks to work with the WMCA and the Mayor to deliver an evidence-based Spatial Development Strategy [SDS] that apportions the WMCA’s unmet housing needs while accelerating sustainable growth for all West Midlands residents.

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¹Lichfields is the United Kingdom’s pre-eminent planning and development consultancy

²Comprising Richborough, St Phillips Land Ltd, Redrow Homes Ltd, Taylor Wimpey Strategic Land and Gladman Developments

02

A lost decade of planned growth

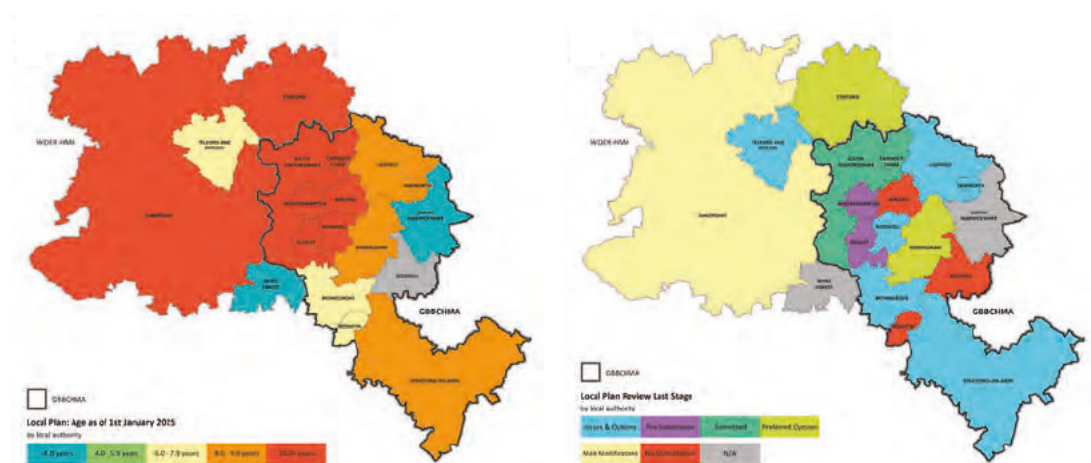
The NPPF is clear that the “*planning system should be genuinely plan-led*” and that “*succinct and up-to-date plans should provide a positive vision for the future of each area*”.³ It is also clear that Local Plans should be reviewed every five years⁴. It is through the production and adoption of Local Plans that Councils can identify land to meet their housing, economic and environmental needs over a 15-year plan period. In the absence of this vision for growth, an area will struggle to be able to deliver development in alignment with its needs or aspirations. This is, in essence, one of the main ways in which planning – or the lack thereof – is hindering the ability to grow the economy.

In this context, despite a flurry of plans being adopted in 2017-2018, most local planning authorities [LPAs] do not benefit from up-to-date Local Plans, with only two Councils across the GBBCHMA and beyond having up-to-date Local Plans, and the average age of a Local Plan being c.9 years old. Whilst most LPAs have started Local Plan Reviews, and it is acknowledged that

plan preparation can take up to 7 years, plan preparation within the WMCA and across the GBBCHMA has been glacial. This has not been helped – in part – by iterative proposed planning reforms since 2020 but has largely been driven by two strategic issues; namely, grappling with the unmet housing needs of the GBBCHMA and Green Belt release.

As a result, Local Plans have either been slow to progress or have started again, with few dealing with important strategic cross-boundary issues of unmet housing needs. By way of example, Solihull's Local Plan Review was found ‘unsound’⁵ in part due to not addressing the unmet needs of Birmingham. Lichfield withdrew their Local Plan Review from Examination in Public [EiP], thereby withdrawing the first tangible proposed contribution towards the BCAs emerging unmet housing needs. The consequences of this have been that for nearly the last decade, neither the WMCA's authorities nor most of the wider GBBCHMA authorities have set out a positive vision for growth in the region, that – crucially – addresses the housing needs of the area.

Figure 1 Maps of Local Plan Age and Local Plan Review Stages



Source: Lichfields analysis

³Paragraph 15, NPPF

⁴Paragraph 345, NPPF

⁵Withdrawn from Examination in Public on 9th October 2024

03 A challenge beyond just the WMCA

Birmingham and the BCAs, which represent a majority of the constituent WMCA authorities, face severe land supply pressures. Constrained by administrative boundaries and limited brownfield land, they have long struggled to accommodate housing needs. Indeed, Birmingham's 2017 Local Plan adopted an unmet need of approximately 37,900 homes up to 2031, while the (then) Black Country Plan Review [BCPR] highlighted a further shortfall of 28,239 homes up to 2039.

Following the BCPR's cancellation, individual BCAs are now preparing Local Plans, most at the Regulation 19 stage, except Walsall. These plans show significant shortfalls against local housing need [LHN] figures under the previous standard method [SM] ("SM2"). Birmingham's Regulation 18 Preferred Options consultation also revealed an acute housing deficit. Analysis by Lichfields indicates a cumulative WMCA-wide shortfall of approximately 93,299 homes up to 2042 under the SM2.

However, revisions to the NPPF and SM ("SM3") have alleviated this issue in part. For instance, the removal of the 35% urban centres uplift from the SM3 has eased the pressure arising in Birmingham, with a theoretical c.5,100 dwelling surplus of supply.⁶ However, a significant gap remains, with an estimated cumulative shortfall of 52,480 homes across the WMCA up to 2042 under the SM3, arising from the BCAs.

However, the revised NPPF introduces transitional arrangements,⁷ allowing LPAs at Regulation 19 – with housing requirements not less than 80% of their SM3-based LHN – or post-submission to be assessed under the previous NPPF and SM2. Sandwell, Wolverhampton, and Dudley would benefit from these, meaning that if adopted, conceivably, the WMCA-wide shortfall would reduce to c.42,800 homes up to 2042 (**Scenario 1**). However, once these authorities transition to the new system, the unmet need is expected to rise again to around 56,300 homes by 2042 (**Scenario 2**).

Table 1: Unmet Housing Need Scenarios

	SM2-based Unmet Needs	SM3-based Unmet Needs	Scenario 1: Likely Unmet Need (if Adopted as Proposed, based Transitional Arrangements)	Scenario 2: Likely Unmet Need (if Transitional Arrangements are Missed, or Review Required at Earliest Convenience)
Birmingham	-54,801	5,171	5,171	5,171
Dudley	-692	-14,384	-692	-14,384
Sandwell	-19,022	-15,140	-19,022	-19,022
Walsall	-8,378	-12,738	-12,738	-12,738
Wolverhampton	-10,406	-10,218	-10,406	-10,218
GBBCHMA	-93,299	-52,480	-42,858	-56,362

Source: Lichfields analysis

⁶This is, in the Consortium's view, based on optimistic assumptions on the delivery of many brownfield sites throughout the city. As such, it is possible that as Birmingham progress their Local Plan Review further, and the supply is tested at examination, unmet housing needs could be identified in due course

⁷Paragraphs 234-235, NPPF

It is noted that this is of course the position without any Green Belt release in the Black Country. In this regard, the revised NPPF is clear that addressing housing needs is considered an 'exceptional circumstance' for reviewing the Green Belt⁸ and these authorities may in due course allocate sites within the Green Belt. Equally, it is only right that opportunities to increase density and utilise brownfield land are explored further; albeit, in isolation, this raises wider spatial planning issues with respect to deliverability, viability and delivering lower-density family homes⁹. As such, the above figures could be reduced further, but it is highly unlikely that these unmet needs will be met, even with further land supply identified in the conurbations.

In any event, it is noted that the BCAs are all proposing to export these needs not just into the GBBCHMA within their draft Local Plans, but also beyond the GBBCHMA towards Stafford, Shropshire, Telford and Wrekin and Wyre Forest; authorities which fall outside of the GBBCHMA. Therefore, these authorities also form part of the 'wider HMA' referred to throughout the functional model analysis.

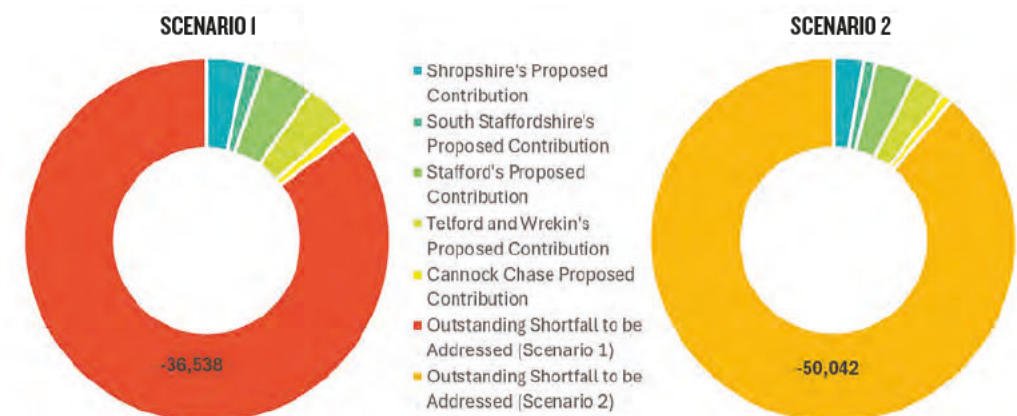
It is important to note that the WMCA straddles two separate HMAs; namely, the GBBCHMA and the Coventry & Warwickshire HMA ("C&W HMA"). Predominantly, a majority of the WMCA falls within the GBBCHMA,

with a small overlap with the C&W HMA. To this end, and considering the NPPF's requirements (i.e. the DtC), the WMCA will need to agree with other LPAs within the GBBCHMA predominantly and potentially beyond to assist in meeting these needs through forthcoming Local Plan Reviews.

In this regard, at present, only Shropshire (1,500), South Staffordshire (640), Cannock Chase (500), Stafford (2,000) and Telford & Wrekin (1,680¹⁰) are proposing to contribute towards addressing these unmet housing needs. Collectively, this would equate to 6,320 dwellings between 2018 and 2042, but, notably, several of these plans have stalled or are at risk of being found unsound in due course.

Notwithstanding the uncertainty regarding these 'contributions', a significant unmet housing need would remain within the WMCA that needs to be addressed. More importantly, few if any of these proposed contributions are underpinned by evidence. Ultimately, there is a significant, and persistent level of unmet housing need across the WMCA and even with some Green Belt releases in the Black Country it is unlikely to markedly reduce the significant shortfall of housing. To this end, the WMCA and wider GBBCHMA authorities will need to make appropriate contributions towards addressing these needs, which should be agreed upon through the SDS.

Figure 2: Currently Proposed Unmet Need Contributions



Source: Lichfields analysis

⁸Paragraph 145, NPPF

⁹In accordance with Paragraph 63, NPPF

¹⁰Telford & Wrekin Council does not explicitly state their approach to addressing the unmet housing needs of neighbouring authorities, but their supporting EHDNA and Technical Report both include a c.80 dpa contribution to addressing the BCAs unmet housing needs over the 2020-2041 plan period, equating to a c.1,680 contribution

04

An opportunity to shape and deliver growth in the WMCA and beyond

As a part of the wider reforms to planning, the Government has emphasised its ambitions to return to a form of 'regional planning', to provide effective new mechanisms for cross-boundary strategic planning. This is driven largely by the need for planning for growth on a larger than local scale. Indeed, the Government is committed to delivering universal strategic planning covering functional economic areas by July 2029.

It is envisaged that this approach will play a vital role in delivering sustainable growth and addressing key spatial issues – including meeting housing needs, delivering strategic infrastructure, growing the economy, and improving climate resilience. Importantly, the Government considers that this approach will also be important in the delivery of Local Growth Plans. To deliver this, the Government has set out its expectations of MCAs in the White Paper.

In particular, the White Paper is clear that MCAs – including the WMCA – will be under a duty to produce an SDS, that can be adopted with 'support from a majority of constituent members'. In terms of meeting housing needs, it states that there will be an:

"obligation to apportion an assessment of the housing need of the Strategic Authority across its constituent members... Agreement on the precise distribution of housing need will be agreed through the SDS development process."

To this end, it is clear that in due course the WMCA will need to prepare an SDS. A key issue for the WMCA when preparing the SDS will be addressing its housing needs within an area constrained by tight administrative boundaries and limited land supply. As such, the SDS will likely need to look beyond the WMCA, to the

wider GBBCHMA – and even beyond – and engage in DtC discussions to ensure the WMCA's housing and economic needs are met.

The Mayor has been clear that his focus is on removing barriers and identifying levers for growth in the West Midlands to attract investment and jobs to help grow the regional economy for all, with a particular focus on improving opportunities for the young and unemployed people. To this end, unlocking housing growth across the region through the SDS could have profound impacts on delivering on the Mayor's ambitions.

Housebuilding has long been recognised for its ability to drive economic growth and support prosperous economies, alongside wider social and environmental benefits – as well as providing much-needed housing to support sustainable communities. Addressing the unmet housing needs issue through the SDS will ensure that a wide range of households will have access to new housing in the right place and located in areas with access to employment opportunities. It will also provide opportunities for young people to enter the construction industry, providing training and apprenticeship opportunities, enabling them to develop skills, and employability and increase their productivity.

Grappling with the issue of addressing the unmet housing needs of the Black Country will play a critical role in unlocking opportunities for growth across the WMCA and beyond. The key question for the WMCA and the constituent authorities when preparing the SDS, therefore, is where outside of the Black Country and even the WMCA will those needs arise and how much (and what proportion) of those unmet needs should that location seek to plan for?

An evidence-based approach



there is no point trying to meet the unmet needs of Birmingham in Glasgow because the socio-economic links would be lost.

Stratford-on-Avon Core Strategy EiP, IR61, Inspectors Report

The revised NPPF emphasises that local planning authorities [LPAs] must cooperate to identify and meet housing needs within their HMA¹¹, supported by relevant and up-to-date evidence¹². It also reiterates that LPAs' continue to be under a DtC¹³. The White Paper will require MCAs to apportion housing needs. However, neither the NPPF nor Planning Practice Guidance [PPG] or the White Paper provides a definitive method for distributing/apportioning unmet housing needs.

A simplistic 'fair share' approach is impractical as some constituent members of the WMCA face significant constraints, such as NPPF Footnote 7 restrictions, making them nearly as limited as the source of unmet needs. Such an approach lacks evidential support¹⁴ and is unlikely to withstand scrutiny at EiP.

The WMCA must address its unmet needs across the GBBCHMA more widely using the DtC, as the Black Country does not operate as an isolated HMA. Instead, they function within the broader socio-economic network of the GBBCHMA. The recent Government consultation on planning reforms affirms this interconnectedness, recognizing that "urban cores do not function in isolation from their hinterlands but as broader housing and employment markets."

In its duty to prepare an SDS and apportion housing needs, the Consortium proposes that WMCA and its authorities adopt a functional relationship-based approach to distribute unmet needs. This method, rooted in migration and commuting patterns, aligns housing distribution with socio-economic linkages. It provides a consistent, evidence-based foundation for addressing needs promptly and has been endorsed at EiPs in other HMAs. By way of example:

- **Coventry and Warwickshire [C&W HMA]:** In 2017, unmet housing needs were distributed via a Memorandum of Understanding [MoU] that accounted for functional relationships, a method supported by EiP Inspectors (e.g., Stratford-on-Avon¹⁵);
- **North Warwickshire:** Addressed Birmingham's unmet needs by considering proximity, connectivity, and functional ties, like the C&W HMA approach, which also received Inspector endorsement¹⁶; and
- **Leicester and Leicestershire [L&L HMA]:** To meet Leicester's unmet needs, LPAs used functional relationships while considering economic alignment and market capacity. A Statement of Common Ground [SoCG] formalized the distribution, which was endorsed at the Charnwood Local Plan Review EiP.

Building on this precedent, Lichfields published The Black Country's Next Top Model in 2022, setting out a three-stage 'Functional Relationship and Gravity Model', which built on the foundations of the functional relationship approaches taken by authorities within the GBBCHMA previously, to address the BCA's unmet housing needs within the GBBCHMA. This approach was tested through South Staffordshire's and Stafford Borough's Local Plan Reviews, with the latter utilising it as justification for their proposed unmet need contributions. Indeed, Wolverhampton has highlighted that the BCAs are attributing proposed contributions proportions based on migration trends¹⁷.

While the NPPF, PPG and White Paper do not prescribe a formal mechanism, a functional relationship approach is an established and robust method for distributing unmet housing needs. The Consortium contends that WMCA must adopt this approach to create an evidence-led framework ahead of the SDS. This will enable the timely and consistent delivery of housing and economic growth within the WMCA and across the GBBCHMA.

¹¹Paragraph 11b, NPPF

¹²Paragraph 36c, NPPF

¹³Paragraph 24, NPPF

¹⁴Paragraph 31, NPPF

¹⁵IR63, Inspectors Report

¹⁶IRI29, Inspectors Report

¹⁷Para 4.6, Wolverhampton Local Plan - Regulation 19 Consultation Cabinet Report 13th November 2024

A Functional Methodology

In view of the above precedent, the Consortium firmly asserts that Lichfields' model offers a logical, evidence-based approach that the WMCA can adopt to apportion and address any unmet needs identified during the SDS process. To this end, this Prospectus sets out an updated methodology, that builds on Lichfields' The Black Country's Next Top Model, and utilises the most up-to-date data, and comprises the below stages:

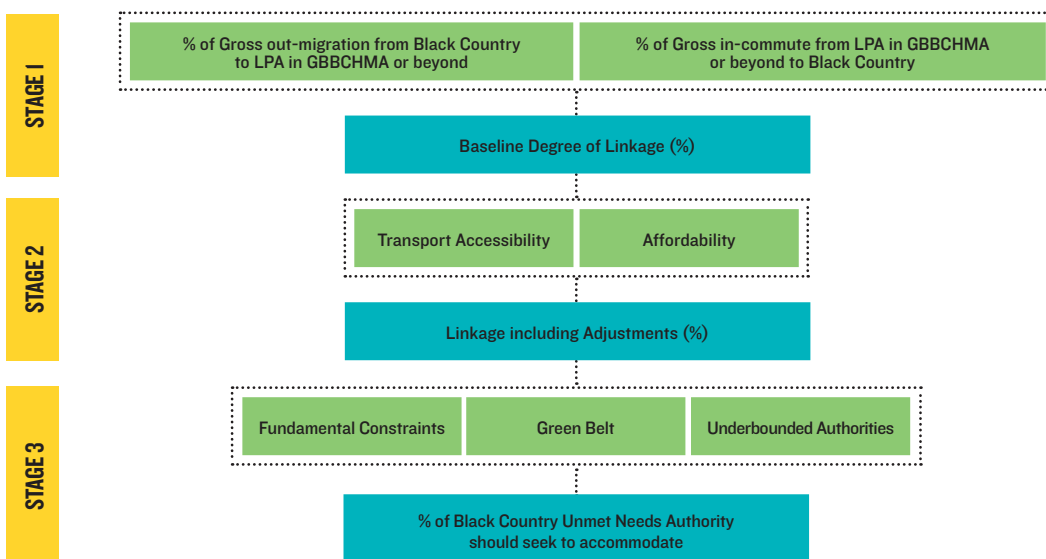
- **Stage 1: Quantifying Linkages** – The first stage identifies, and analyses, the functional linkages (commuting and migration patterns) between the GBBCHMA and other authorities and the Black Country to quantify and define a 'base share' of the unmet need;
- **Stage 2: Sustainability and Market Signals Adjustments** – Considers whether other factors might influence the quantum of need that is appropriate for a district to accommodate. This includes adjustments reflecting sustainable transport links and affordability pressures;
- **Stage 3: Environmental and Physical Constraints** – The third stage considers whether environmental constraints (specifically NPPF Footnote 7 – excluding

Green Belt), policy constraints (Green Belt) or physical constraints (Under-bounded districts) might influence the quantum of need which is appropriate for a district to accommodate;

- **Outcomes** – The final stage concludes on the proportion of the overall unmet housing need that each of the GBBCHMA authorities and others should seek to meet through their Local Plans. This stage accounts for adopted commitments in Local Plan Reviews and includes the application of a cap that limits the increases any one individual local authority can face up to 25%.

Importantly, Lichfields' model reflects key choices people make with respect to where they live and work and utilises this to demonstrate how far, and the degree to which, this impacts the authorities within the GBBCHMA and beyond. Fundamentally, Lichfields' model is weighted towards location and communities that can accommodate greater levels of growth across the region, but it also ensures that each authority would still take a 'fair share' and would not be disproportionately impacted by the outcomes of the model.

Figure 3 Lichfields Methodology



Source: Lichfields

Stage 1: A baseline degree of Linkage

17%

of the people moving out of the Black Country moved to South Staffordshire (2012-2021)

67%

of the Black Country's in-commuters come from the wider HMA and beyond

Whilst sitting within the GBBCHMA, the Black Country HMA can be characterised as a sub-market in its own right. Although each authority within the Black Country will demonstrate its own individual migration and commuting trends, the four authorities have previously operated as a whole for plan-making purposes and this analysis looks at the Black Country's cumulative trends within the wider strategic HMA.¹⁸

Migration

The four authorities comprising the Black Country are situated to the north-west of Birmingham. If we look at migration flows from these authorities to other areas of the wider HMA, we can see that the Black Country authorities have relatively uneven patterns of migration. Indeed, the flows over the 2012 to 2021 period suggest that the housing preferences for households leaving the Black Country tend to gravitate towards Birmingham in the first instance, followed by South Staffordshire, Shropshire, Cannock Chase, Wyre Forest, Telford and Wrekin, and Lichfield.

In particular, the strongest focus for out-migration is to Birmingham (44%), which represents the lion's share, the second largest migration flow within the area is to South Staffordshire, accounting for 17% of all outward migration over the 2012 to 2021 period. Importantly, this gross outward migration flow over the eight years provides an indicator of the spatial extent of the geography in which the Black Country's unmet housing need might impact.

Travel to Work

By its nature, the Black Country HMA is relatively self-contained when it comes to commuting patterns.¹⁹ However, despite the employment opportunities on offer, the four BCAs themselves experience an overall net decrease of c.25,000 people daily, with c.96,500 people commuting into the Black Country daily, and c.121,500 commuting out to other authorities for work.

Except for Wolverhampton (which gains around 3,800 workers each day), the remaining Black Country authorities all see a workday population decrease. The most significant is that of Dudley, which experiences a net loss of 18,700 commuters daily, the majority of which travel into Sandwell or Birmingham for work.

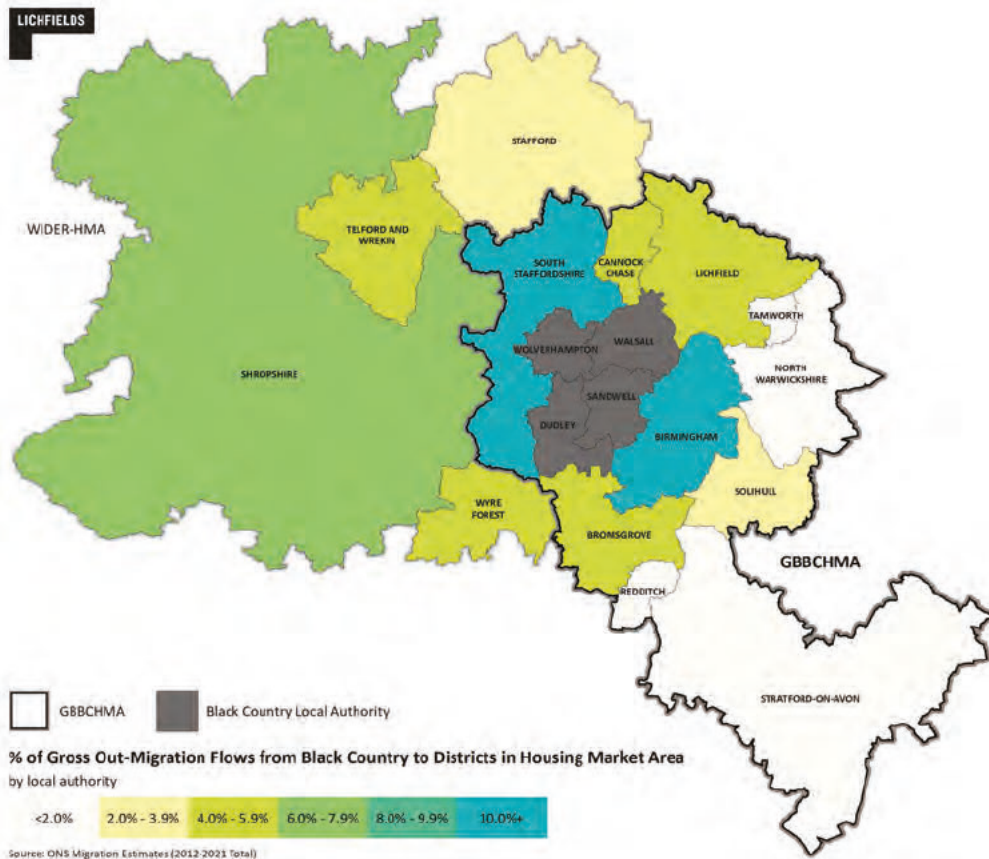
In general, travel to work flows into the Black Country tends to correlate with migration patterns. The 2021 Census showed that the major travel inflow is from the wider HMA into the Black Country arises from Birmingham and South Staffordshire at 33% and 25% respectively. Overall, around 83% of the commuting inflow to the Black Country Authorities arises from the rest of the wider HMA. The areas highlighted in Figure 6 show the extent of the Black Country's reach across the GBBCHMA.

Staffordshire at just over 50%. Overall, around 83% of the commuting inflow to the Black Country Authorities arises from the rest of the wider HMA. The areas highlighted in Figure 5 show the extent of the Black Country's reach across the GBBCHMA.

¹⁸The analysis does not exclude Birmingham following revisions to the NPPF and SM which suggest that it is now able to meet its own housing needs

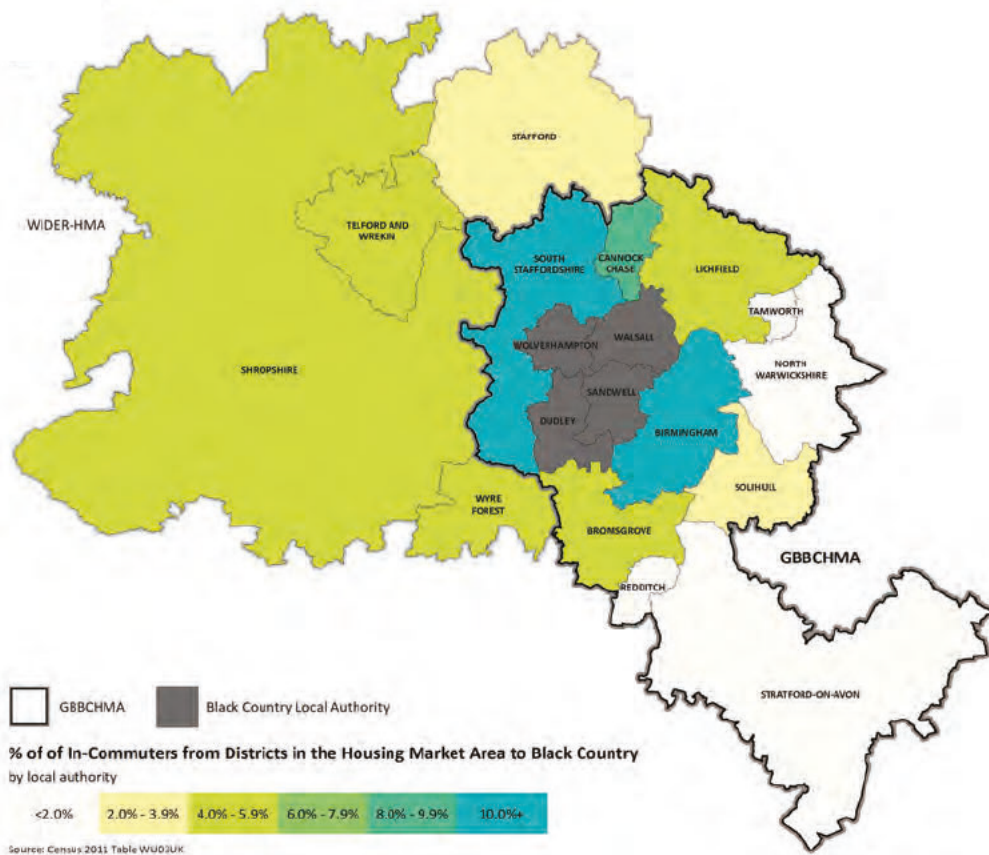
¹⁹Although origin/destination data released for the 2021 Census in 2023 is heavily skewed due to the restrictions in place during the 2021 fieldwork which resulted in fewer people moving due to the Covid-19 pandemic, the percentage commuting flows show that 2021 data closely matches 2011 in terms of overall patterns within the HMA and beyond, despite the number of people reported as commuters being lower for the reason above

Figure 4 Gross out-migration (from the Black Country)



Source: ONS Migration Estimates (2012-2020 Total) and 2021 Census, Lichfields analysis

Figure 5 In-commuters (to the Black Country)



Source: 2011 Table WU03UK, Lichfields analysis

Within the GBBCHMA we can quantify the extent to which each district is linked to the Black Country and define a ‘base share’ of unmet needs that they might need to accommodate

In simple terms, unmet housing needs from within the Black Country will place additional pressure on those areas that are linked in housing market terms, which go beyond the WMCA and even the GBBCHMA. This is because an undersupply of housing in the 4 Black Country districts will likely lead to more migration out of and less migration into these areas as the market for homes becomes increasingly tightened, with workers in these areas forced to look at homes elsewhere.

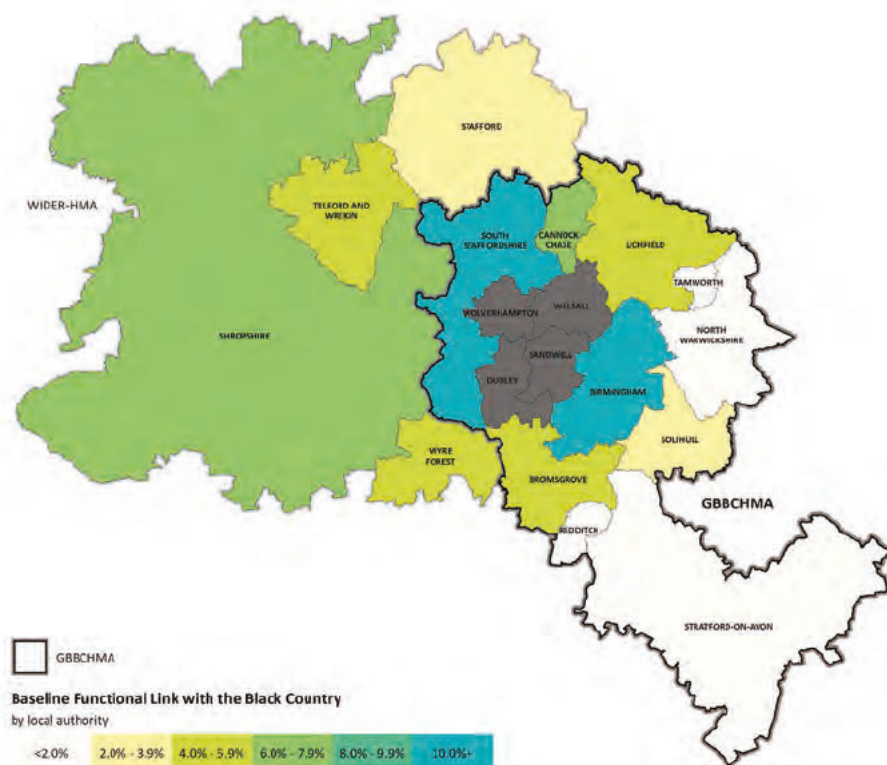
Areas that have strong functional relationships to the Black Country in terms of both the migration of house movers and commuting patterns will face greater pressures from unmet needs.

To identify a base position of the share of the WMCA’s unmet housing needs, arising

within the GBBCHMA, each district should accommodate, Lichfields has drawn on the analysis of out-migration and in-commuting flows. These are then converted into a simple percentage of what proportion of the migration flow is directed into the other HMA districts from the Black Country; and commuting flows into the Black Country.

By averaging this out, we can determine a percentage for each District, adding up to 100% for the whole HMA and beyond. This percentage represents the baseline degree of housing market linkage an area has with the Black Country and therefore is representative of its starting share of their unmet needs which will need to be met in the GBBCHMA and beyond. This is illustrated in Figure 6.

Figure 6 Base share of unmet needs



Source: Lichfields analysis

Stage 2: Uplift and restraint factors

Areas with good public transport links to the Black Country provide an opportunity to help deliver the area's unmet needs and support more sustainable commuting patterns.

The NPPF sets out an approach to sustainable development patterns that specifically identifies support for patterns of development which facilitate the use of sustainable modes of transport.

Moreover, where Green Belt release is considered necessary, plans should give first consideration to land which has been previously developed and/or is well-served by public transport²⁰. Across the wider HMA locations will offer different opportunities for supporting sustainable commuting patterns.

The West Midlands benefits from one of the most highly integrated rail networks in the country. Figure 7 shows all the stations across the HMA and beyond with direct links to Black Country terminuses, including the fastest

commuting time. To account for these links in the gravity model, rail stations and the fastest travel times to a Black Country terminus are used as a proxy for a district's public transport connectivity to where the unmet needs arise. This has informed the uplift factors applied to each district's base share of unmet needs – as illustrated in Table 2.

Table 2: Sustainable Transport adjustment factors

Time from Station in District to Black Country Terminus (Minutes)	Adjustment
<10 mins	+20%
11-20 mins	+10%
21-30 mins	0%
31-40 mins	-10%
>41 mins	-20%

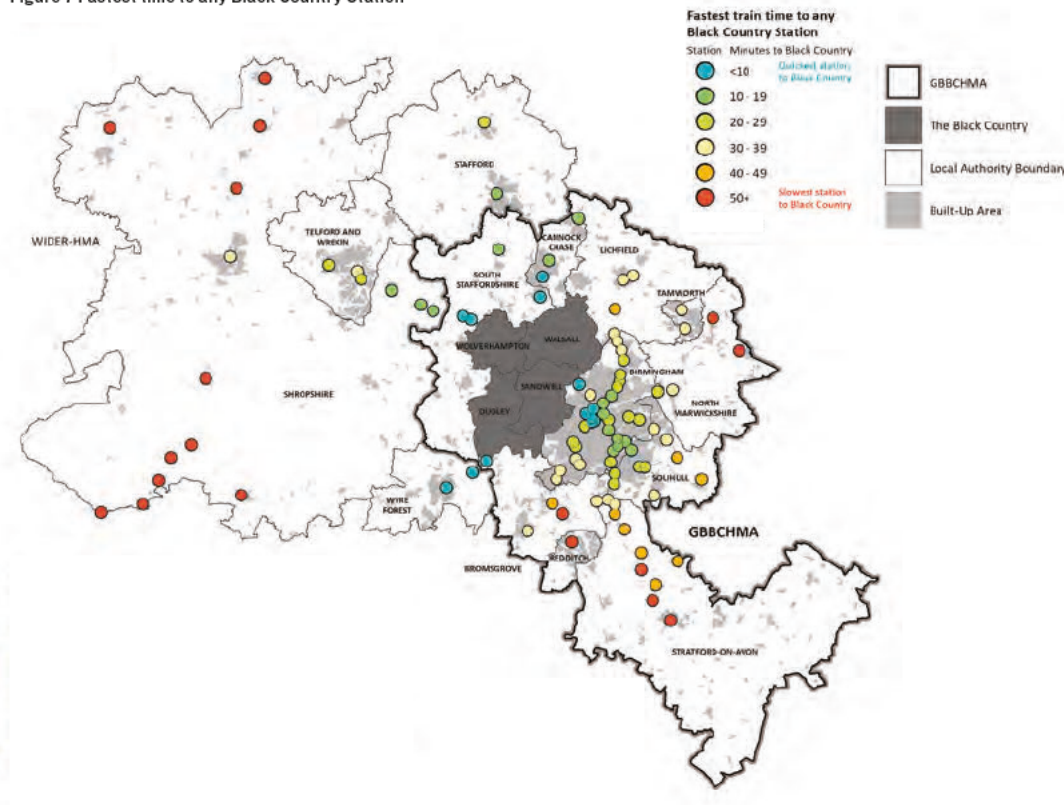
Source: Lichfields analysis



Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

NPPF para 107

Figure 7 Fastest time to any Black Country Station



Source: Trainline, Lichfields analysis

²⁰Paragraph 147cb, NPPF

Adjusting for affordability

High affordability ratios are a general indication that house price growth is outpacing household income growth and underpin the Government's uplift adjustment to the household projections that inform the standard methodology for identifying Local Housing Needs.

It is reasonable to assume that those areas with greater affordability pressures should be expected to do more than their 'share' to provide choice in the housing market and limit worsening affordability. Consideration has therefore been given to how adjusting authorities' shares of the overall need could reasonably be expected to improve affordability and ensure that the housing needs are met.

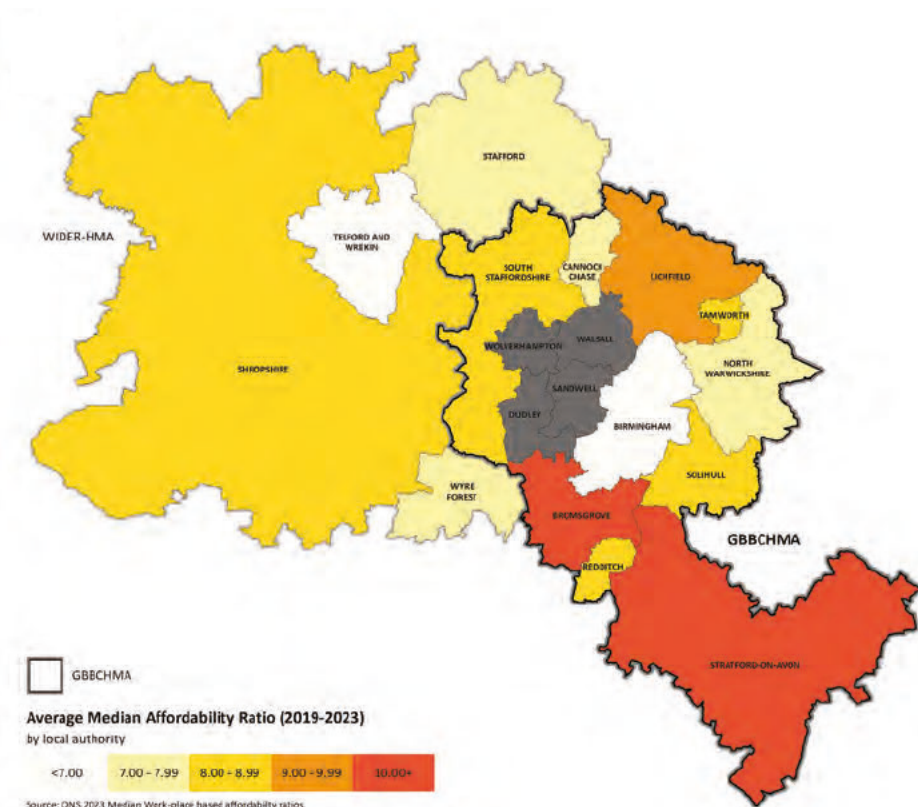
To account for this in the model, we have utilised the ONS median workplace-based three-year average affordability ratios (i.e. the 2020-2023 ratios²¹) and the SM3's affordability adjustment²² and applied adjustments to each district's base share of unmet needs. This is illustrated in Table 3 and Figure 8.

Table 3 Affordability adjustment factors

Revised Standard Method Theoretical Uplift	Adjustment
<1	-20%
1-1.2	-10%
1.2-1.4	0%
1.4-1.6	+10%
>1.6	+20%

Source: Lichfields analysis

Figure 8 5-year average median affordability ratios (2019-2023)



²¹Published In March 2024

²²PPG ID: 2a-004-2024|2|2

Source: ONS 2023 Median work-place based affordability ratio, Lichfields analysis

Stage 3: environmental and physical constraints

Development constraints will mean that parts of the GBBCHMA and beyond may be better placed to respond to growth pressures than others.

The NPPF is clear that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless protected areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development in the plan area.²³

However, very few, if any, districts are fundamentally constrained to the point where they cannot accommodate any additional growth. Whilst constraints will cover parts of the district, in most areas there are also less environmentally sensitive areas which could potentially accommodate development.

The gravity model therefore distinguishes those constraints which are fundamental and ultimately would prevent development appropriately being allocated through a Local

Plan process (e.g. fundamental NPPF footnote 7 environmental constraints²⁴) from those that are policy choices (such as Green Belt).

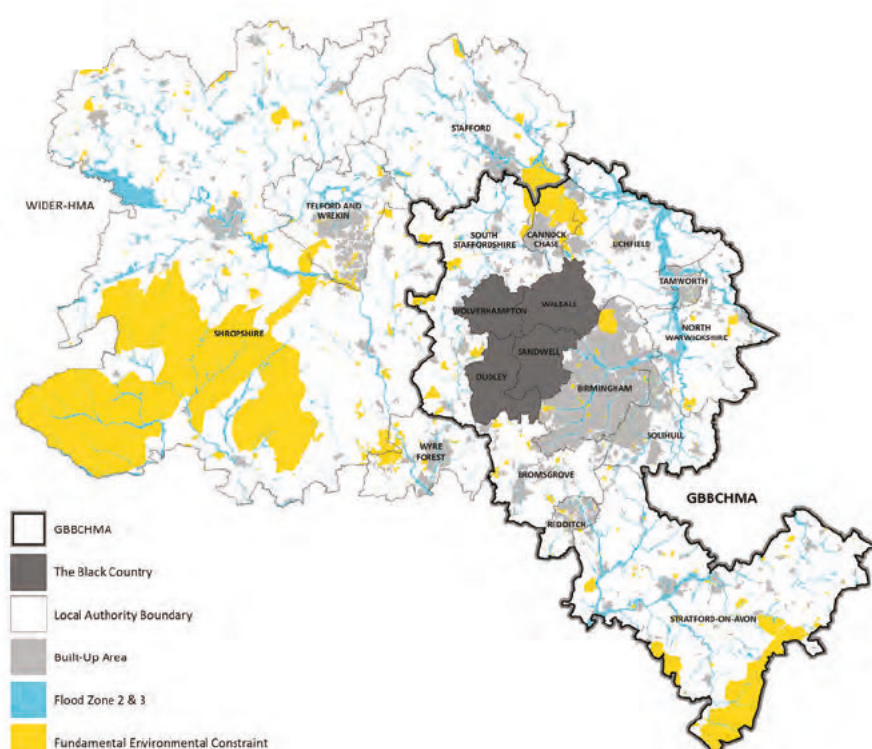
By mapping Footnote 7 environmental constraints²⁴ across the wider GBBCHMA for each district, the proportion of the district's area that is constrained is identified. Ranking this allows uplift factors to be applied as set out in Table 4.

Table 4 Affordability adjustment factors

Footnote 7 Constraints	Adjustment
<10%	+20%
11-20%	+10%
21-30%	0%
31-40%	-10%
>41%	-20%

Source: Lichfields analysis

Figure 9 Footnote 7 Constraints



Source: Natural England, Historic England, Lichfields analysis

²³Paragraph 11b, NPPF

²⁴Footnote 7 of the NPPF: "The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change."



Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans... Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means.

(Paragraph 142, NPPF)

If those areas with high levels of Green Belt are excluded, the implications for those areas with less Green Belt become stark.

The West Midlands Green Belt, approved in 1975, is the largest of the three Green Belts in the West Midlands. It surrounds Birmingham and Solihull, the Black Country and Coventry and extends from Stafford and Telford through to Stratford-upon-Avon, Warwick, and Rugby.

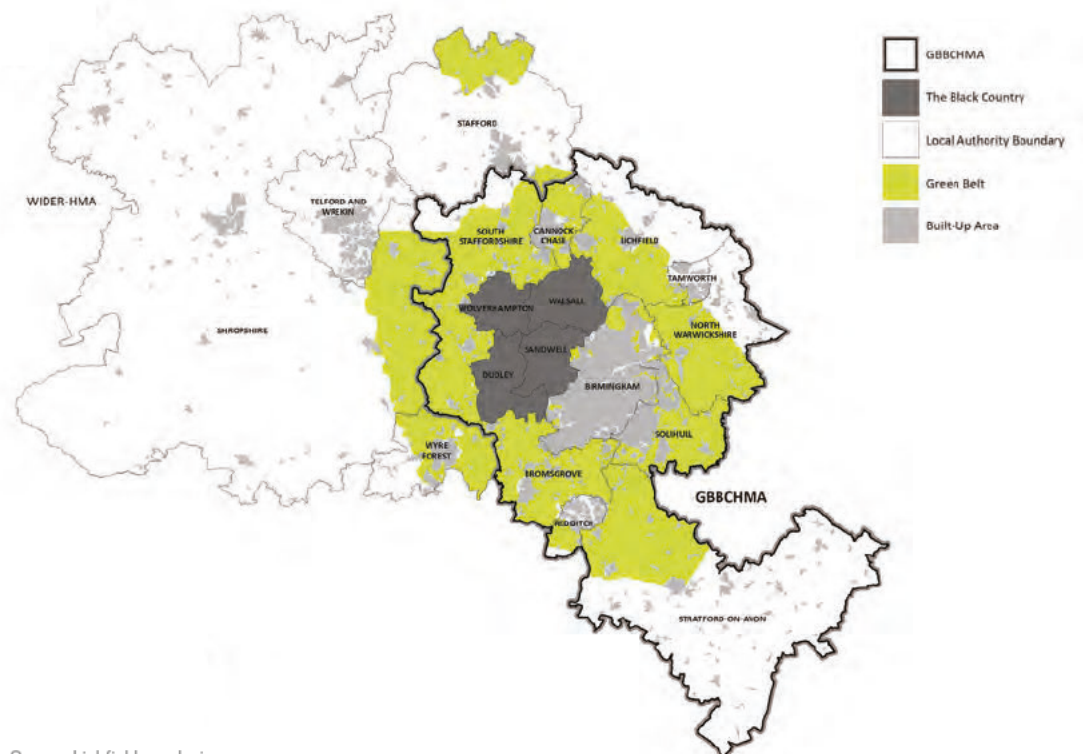
Notably, the inner boundaries of the Green Belt closely follow the edges of the conurbation and Coventry, resulting in very little land left between the urban area and the Green Belt to provide for longer-term development. As a result, the release of the Green Belt has been a longstanding point of contention across the region for many years, dating back to the Regional Spatial Strategy. Indeed, many authorities are still grappling with the potential political consequences of meeting their housing needs in areas of high Green Belt land.

As noted above, the model does not include the Green Belt as a fundamental constraint. This is because the Green Belt is a function of the Local Plan process, where there will be legitimate reasons for reviewing its boundaries, such as the

acuteness of housing needs.²⁵ Indeed, including Green Belt as a fundamental constraint would unsustainably burden authorities with no Green Belt land, shifting needs onto districts that may be less sustainable, and in practice meaning that Telford and Wrekin would be expected to accommodate all of the Black Country's unmet needs on its own. Even if we focussed growth in areas where the Green Belt covers less than half of a district's area, such as Shropshire, Stafford, Stratford on Avon, and Tamworth, this would still have a similar effect, meaning that districts with a weaker socio-economic linkage with the Black Country would be bearing the majority of the burden, promoting unsustainable commuting patterns and the delivery of housing in less desirable locations.

Recognising the need to promote sustainable patterns of development within the Green Belt, by mapping Green Belt land across each of the districts, the proportion of the district's area that is covered by it is identified. Ranking this allows uplift factors to be applied.

Figure 10 Green Belt



²⁵Paragraphs 146-146, NPPF

Source: Lichfields analysis

Some districts are underbounded and face significant problems in meeting their own needs, making it unlikely that they can accommodate GBBCHMA's unmet needs.

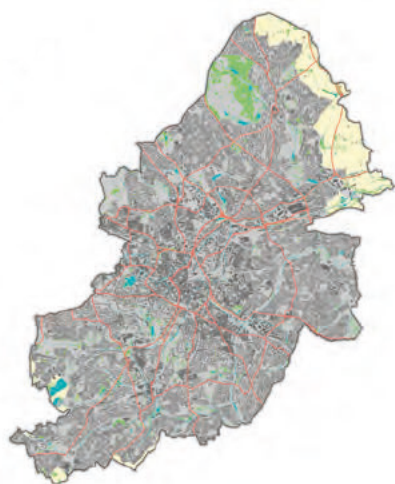
Whilst some authorities within the HMA might not be overly constrained by Footnote 7 designations, there is a need to consider whether some have grown to the extent of their administrative boundaries and have limited available land to accommodate further expansion. These authorities are considered 'underbounded' and are not likely to be able to help meet the GBBCHMA's unmet needs.

As shown in Figure 10, there are significant urban areas across the GBBCHMA. Notably, much of the Black Country is urban in character and 'underbounded'. The urban structure arose from its industrial centres, which have consequently coalesced into a continuous polycentric urban form. Notably, a majority of the available land within the Black Country appears to be located within the town centres, on existing employment sites, or surplus open spaces. Many of these authorities have been developed right up to their respective boundaries, have a tightly knit urban form and lack suitably large sites, coupled with potential issues with the brownfield land supply (i.e. contamination), hence it will be difficult for these authorities to meet their own growth let alone the wider HMA's.

Notably, Birmingham is urban in character and 'underbounded', which has resulted in it historically not being able to meet its housing needs. Birmingham has largely been developed right up to its boundaries, save some areas of Green Belt. It also has a tightly knit urban form, lacks suitably large sites and has equally has issues with the brownfield land supply. Whilst there may be a question from the Black Country Authorities as to whether Birmingham could utilise its purported oversupply to meet their unmet needs, it is unlikely that it will be able to contribute towards the BCA's unmet needs as, firstly, this surplus is untested, and secondly, it will likely need this surplus to provide a land supply buffer²⁶ for its own needs. Similarly, such circumstances are present in Tamworth, which has historically concurred that it is unable to assist in meeting the GBBCHMA's unmet needs and engaged with Lichfield and North Warwickshire to meet its own unmet needs.

Underbounded authorities will continue to face the pressure to meet their own individual housing needs. Reflecting the problems such areas face meeting their own needs, these districts are ascribed a -100% adjustment factor, essentially meaning that the 'gravity model' assumes these areas will be unable to help meet GBBCHMA's unmet needs.

Figure 10 Underbounded authorities – Birmingham & Tamworth



Source: Lichfields analysis



Source: Lichfields analysis

²⁶It is expected that Local Plans should be sufficiently flexible to adapt to rapid change. In practice, this means ensuring a housing trajectory has sufficient land supply across the plan period so that it can adjust and accommodate any unforeseen circumstances, such as a degree of flexibility in delivery rates and densities. Critically, this means that to achieve a housing requirement a Local Plan must release sufficient land or allow sufficient 'headroom' so that there is an appropriate buffer within the overall planned supply

Outcomes

Using the baseline degree of linkage and then applying the uplift and restraint factors provides illustrations of how the Black Country's unmet housing need might be distributed.

Lichfields' model has taken account of the degree of migration and commuting linkages within the wider GBBCHMA, opportunities to capitalise on sustainable transport links and improve affordability, and the degree of environmental and physical constraints which might impede on an authority's ability to accommodate unmet housing need.

Drawing on the preceding analysis, Figure 12 illustrates how these considerations have demonstrated the functional linkages between the authorities within the GBBCHMA and beyond, and the origins of the unmet housing need, and shows how the GBBCHMA's unmet housing needs could be sustainably distributed.

Whilst the exact scale of the GBBCHMA's unmet needs may fluctuate and change as some Local Plans are adopted in advance of the SM₃, based on current evidence this could be at least 42,900 to 2042. It is possible that this could rise to over 56,300 when those Local Plans are reviewed in the future considering the revised SM₃.

Lichfields' model indicates that to address these needs across the GBBCHMA and beyond, a reasonable distribution would see most authorities accommodating between 1-10% of the GBBCHMA's unmet need. However, there are several outliers – the underbounded districts of Birmingham and Tamworth (which have been allocated zero extra units) and the districts of Wyre Forrest (11%), Shropshire (11%), Lichfield (12%) and South Staffordshire (25%) which are very well related to the 4 Black Country districts respectively.

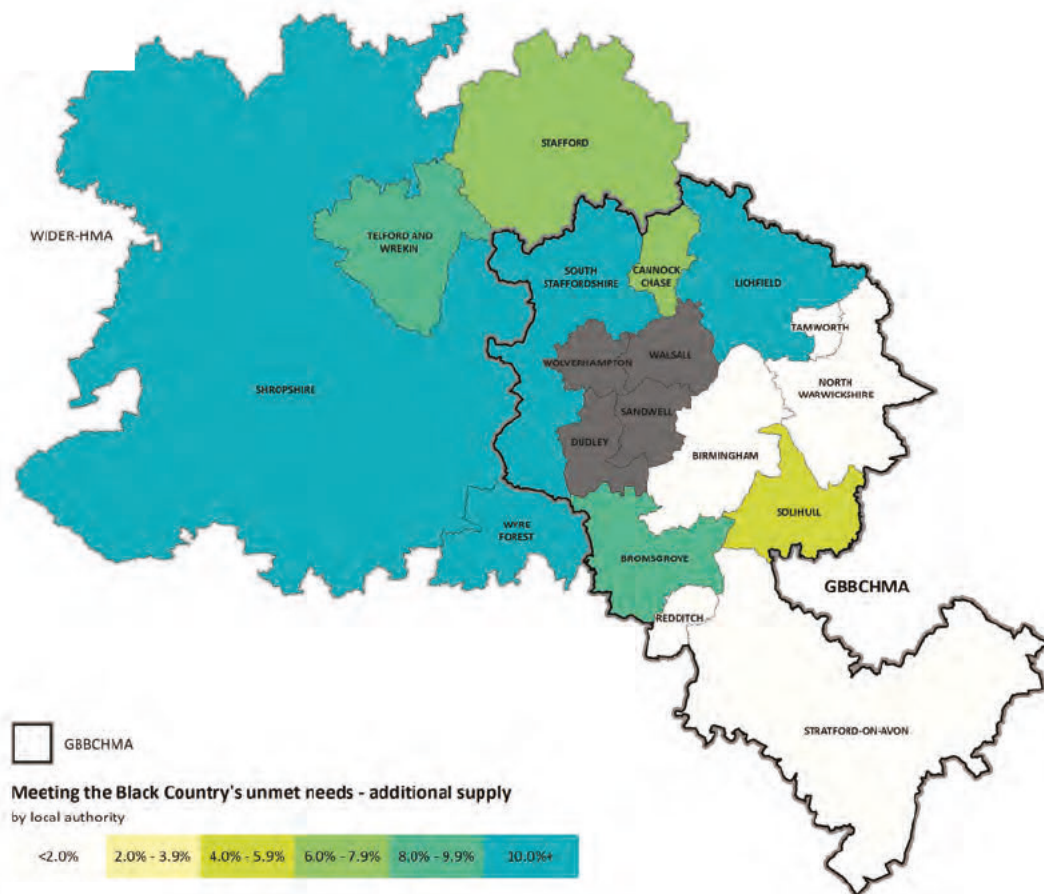
As few of the GBBCHMA authorities have sufficiently advanced their Local Plan Reviews, and even those that are at EiP are now in question, no adjustments have been made for adopted commitments.

However, whilst the fundamental aim of the model is to apportion these needs to areas with higher levels of socio-economic linkages with the origin of the unmet housing needs, there is clearly a need to ensure that each authority would still take a 'fair share' and would not be disproportionately impacted by the outcomes of the model. Much in the same way that the SM₃ includes a series of mechanisms to ensure that the output of the SM₃ (i.e. the LHN) for an authority is not misaligned with the existing housing stock of an area (i.e. a tacit 'cap'), Lichfields' model ascribes a 25% 'cap' to authorities that the models indicate would exceed this figure, with the other authorities experiencing a commensurate increase in their contributions.

As a result, and similar to Lichfields' The Black Country's Next Top Model, this model ascribes a 25% 'cap' to South Staffordshire.

This is because, in the absence of this adjustment, Lichfields' model indicates that to address these needs across the GBBCHMA and wider area, a reasonable distribution would see South Staffordshire taking c.37% of the needs. This is, by virtue of the geographic relationship the district has with the Black Country and relative to the other socio-economic and environmental factors assessed within the model, unsurprising.

Figure I2 Meeting the GBBCHMA's unmet needs – additional supply by authority



Source: Lichfields Analysis

Conclusions

The planning system should be genuinely plan-led, and often achieving sustainable economic, social and environmental growth requires planning for growth on a larger than local scale. As we move back into an era of planning more regionally through SDS, the Consortium strongly contends that this presents a significant opportunity for the WMCA to address some of the key challenges facing the region and drive economic growth for all residents.

As the WMCA embarks on preparing an SDS, it will be critical that the WMCA effectively deal with, rather than defer, this critical strategic matter. This is because the unmet housing needs of the Black Country place considerable pressure on adjoining areas to accommodate additional housing development, and emerging Local Plan provisions from the GBBCHMA are wholly insufficient.

If the WMCA fails to meet their housing needs through the SDS, the implications are that those needs will not simply disappear; they will either result in increasingly negative housing outcomes for people living in these conurbations, or they will mean households will have to look elsewhere to meet their housing needs. All of this will not support economic growth across the WMCA and region and has the potential to worsen opportunities for young people in the long run.

As such, the SDS will need to look beyond the WMCA, to the wider GBBCHMA – and even beyond – and engage in DtC discussions to ensure the WMCA's housing and economic needs are met. To assist the WMCA in its duty in advance of preparing the SDS, the Consortium has commissioned this Prospectus to demonstrate to the WMCA that an evidence-based approach to addressing the WMCA's housing needs is achievable, should inform the DtC discussions, and will enable the WMCA to accelerate sustainable growth for all West Midlands residents.

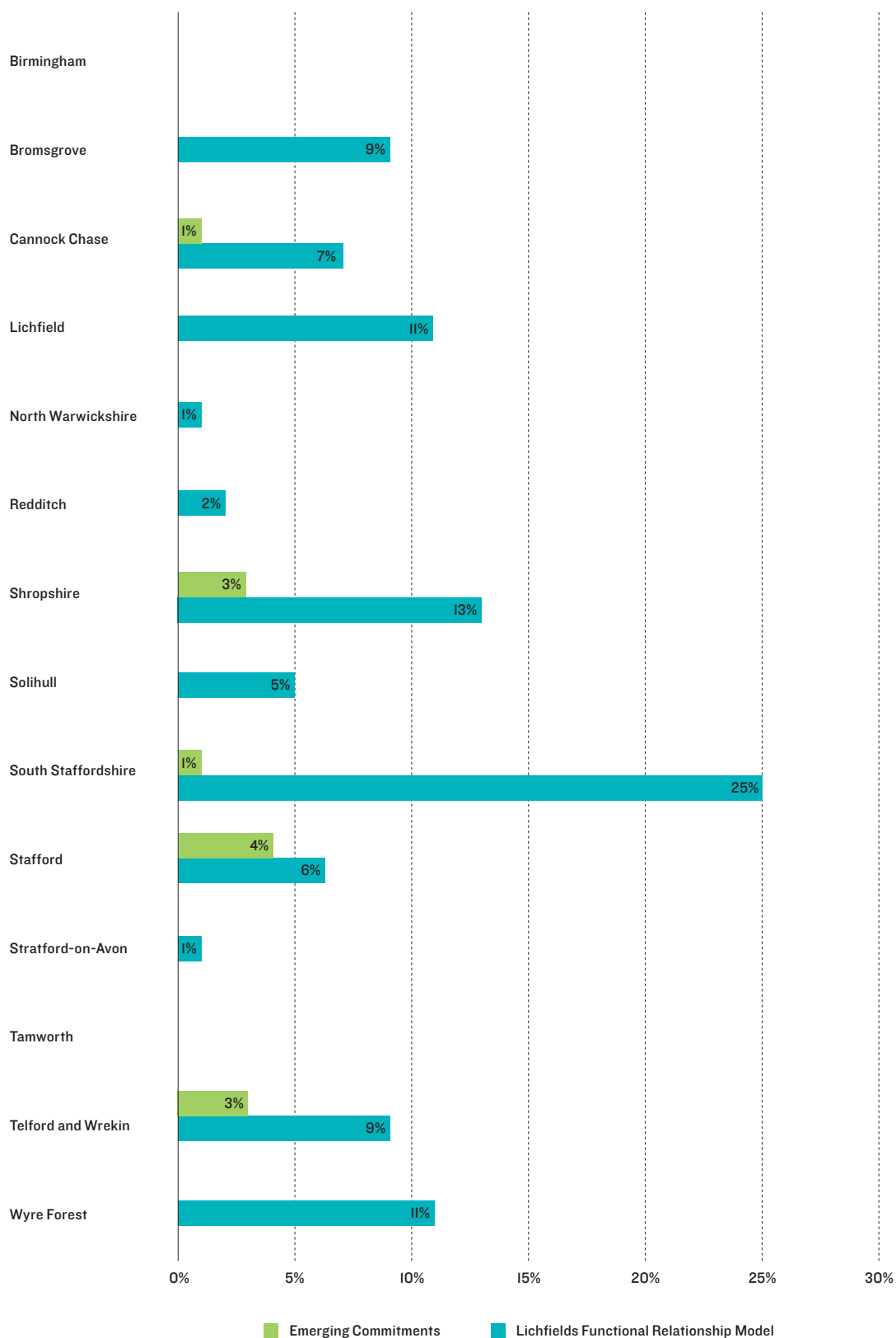
Whilst some authorities have proposed specific figures within emerging Local Plans to help meet the unmet needs of the Black Country, Lichfields' model indicates that the proposed quantum is insufficient. Figure 12 above sets out the percentage levels of unmet need authorities within the GBBCHMA and beyond that could justifiably be seeking to make provision for, based upon Lichfields' functional relationship and gravity model. Figure 13 below compares this distribution against the emerging commitments made by the GBBCHMA and other authorities to meet this need and shows that many authorities will need to more than double their contributions to sustainably and appropriately address these needs.

Notably, the disjointed approach taken to date has highlighted the plan-making tensions caused by a fractured regional approach, as many of the emerging contributions are insufficient to address the scale of the unmet needs of the WMCA. The Consortium contend that this again emphasises the importance of taking a collective WMCA-wide approach to addressing unmet housing needs through the DtC and the SDS.

On this basis, crucially, the WMCA should work together with the authorities identified within this report to ensure that the WMCA's needs are effectively met, particularly if other planning considerations indicate that they are unable to accept the apportionment suggested by the Prospectus (i.e. following Green Belt Reviews /Sustainability Appraisals).

The Appendix to this report sets out the results of Lichfield's approach to distributing the unmet needs in more detail and can be used as a starting point for considering the scale of additional supply LPAs should be seeking to make provision for.

Figure I3 Meeting the GBBCHMA's unmet needs – comparison between emerging commitments and Lichfields' model



Source: Lichfields analysis

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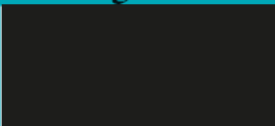
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