

Planning and Highways Meeting
Thursday 17 September 2026
Trinity Centre
6pm

PRESENT:

Cllrs: Allen, Auton, Briggs (Chairman), Clarke, Griffiths – Hughes, Khan (non-voting observer), Roberts and Singla.

IN ATTENDANCE:

Jon Lord	(JL)	Head of Regeneration and Sustainability
Natalia Gorman	(NG)	Project Manager

No residents in attendance.

49 Apologies for Absence

JL reported apologies for Cllr Parmar.

Resolved to note the apologies.

50 Declarations of Interest

None.

51 Minutes of the Previous Meeting

Resolved that the minutes of the meeting of Planning and Highways Committee held on 1st September 2026 be signed as a true record.

52 Matters Arising

53 Questions from Members

None.

54 Birmingham Local Plan

The Chairman thanked JL for his report.

The Chairman reminded Committee that this is the last chance the Town Council has to comment on the final revised Birmingham Local Plan which will guide development across the city including Sutton Coldfield up to 2044.

JL introduced his report by explaining that The Birmingham Local Plan (BLP) has now progressed to the Regulation 19 publication stage. The Regulation 19 publication stage is the final formal consultation period for a local authority's draft Local Plan before it is submitted to Government for independent examination to test if it is "sound" and legally compliant. At this stage, comments on the Birmingham Local Plan Regulation 19 Publication Plan (BPP) are limited to legal compliance and "soundness" rather than general feedback.

It is important to note that Birmingham City Council (BCC) is progressing the Local Plan through the 'old plan making system' which requires plans to be submitted for examination by the end of 2026. If this is not achieved, then BCC is likely to have to re-commence the Local Plan preparation from the start under the new plan-making system. This would have potentially serious implications for the Royal Town of Sutton Coldfield as the absence of up to date local planning policies for potentially a number of years whilst a new Birmingham Local Plan is produced would result in an over reliance on national planning policies set out within the National Planning Policy Framework (NPPF) and the emerging West Midlands Regional Spatial Strategy covering such contentious issues such as Green Belt/grey belt and future housing numbers.

JL explained that the government published a revised NPPF in August 2026. This is very much "pro-growth" and is more permissive in relation to green belt and grey belt development. Relying on this for planning decisions would likely leave the town's Greenbelt more vulnerable to development and its urban area with potentially inappropriate densities.

JL noted that it is therefore in the Town Council's interests that BCC is able to progress the Birmingham Local Plan as quickly as possible and achieve the December submission deadline and then through examination and adoption without delay. In this context it is important to support policies that are considered "sound" as some will be challenged by other parties in an attempt to persuade the Inspector otherwise. However, this shouldn't negate the Town Council's ability to propose minor amendments to help improve the plan's soundness whilst reflecting local priorities.

JL stated that whilst the BPP broadly continues with the same development strategy as set out within the previous version-the Focused Preferred Options Document (FPOD) (a focus primarily on brownfield regeneration through redevelopment within the identified growth zones, housing regeneration areas and major development sites), there are a number of differences, including its approach to the Green Belt, updates to Sutton Coldfield town centre related policies and residential densities. Whilst there are other changes set out in BPP, this report focuses on the above subjects as these are considered to have the most significant impacts on the town's future development and were also the focus of the Town Council's previous (December 2025) representations to the FPOD and have been the focus of local campaigns and correspondence with both Town Councillors and residents.

Overall, it is considered that the BPP is "sound" particularly with its commitment to protect the existing greenbelt boundary and focus of new development within the urban area (notwithstanding the Langley Sustainable Urban Extension (SUE) & Peddimore allocations), and sets out an appropriate approach to the location and quantity of new development in the Royal Town of Sutton Coldfield.

JL recommended that BCC's planners should be commended for progressing the BPP so quickly as it's clear that a lot of work has been delivered in the context of the Government's constant changes to the planning system. Furthermore, JL noted that BCC's planning team's willingness to engage

Town Council officers should also be acknowledged. Whilst the Town Council may not have agreed on every topic such as the Green Belt Assessment (GBA), Town Council officers been able to directly input into the BPP's town centre policies to improve the alignment with the Royal Sutton Coldfield Town Centre Masterplan Supplementary Planning Document (SPD). In addition, discussions continue on identifying future planning platforms to ensure the Town Council's aspirations for future development within the Royal Town are realised. JL noted there's a lot of work to do on this and committed to updating Committee on progress.

Turning to the suggested responses outlined within the Report, JL set out that the proposed development strategy for the period of the Birmingham Local Plan focuses development primarily on brownfield regeneration through redevelopment within identified 'Growth Zones' (none of which are located within Sutton Coldfield), town and local 'Centres for Change' (which includes both Sutton Coldfield town centre and Boldmere local centre), housing regeneration areas and major development sites. For the latter these include both the Peddimore Employment Area and the proposed Langley SUE.

Through the previous iterations of the Birmingham Local Plan, the Town Council has consistently expressed its support for the strategy of focussing development within the urban area, along with the approach to transportation policies, town centre regeneration and its alignment with the Town Centre Masterplan Supplementary Planning Document (SPD). Within its FPOD submission, the Town Council argued that its development strategy could be made more sustainable through ensuring that all of the identified shortfall of employment land is accommodated within the urban boundary through focusing on brownfield regeneration and the identification of additional underperforming employment sites. This has now been incorporated within the BPP which is welcomed.

In addition to suggesting amendments to the FPOD to improve alignment with the Town Centre Masterplan SPD, and to address concerns regarding the environmental impact of the Langley SUE and housing densities in the town centre, JL explained that the Town Council also objected to the FPOD's approach to the Green Belt. BCC commissioned a new GBA to accompany the FPOD. This identified 'grey belt' sites for potential allocation subject to further evaluation work. Unsurprisingly, given most of the Green Belt is in North East Birmingham / Sutton Coldfield, it followed that most of land assessed as being potential 'grey belt' was also located within this area.

The GBA is important because it may influence which areas of Green Belt land around Sutton Coldfield are considered for future development through BCC's emerging Local Plan. The GBA also opens the potential for speculative planning applications outside of the Local Plan process and developers/land promoters could draw on the evidence within the GBA to try and support cases for development

The GBA identified separate land parcels on the north and north-east of Sutton Coldfield, currently within the Green Belt which could be taken forward as potential grey belt. The identification of these areas as potential grey belt increased the risk of them being developed in the future either through being allocated in the Local Plan or by way of speculative planning applications and appeals.

As part of its response to the FPOD consultation, JL reminded Committee that it rigorously objected to the approach set out in the FPOD; raising concerns regarding the methodology applied by the GBA to identifying 'grey belt'.

Following a request made by Committee at the December 2025 meeting, an external consultant (Freeths) was appointed to undertake a review of the GBA. Their Report (subsequently referenced as the Freeth Report), identified some serious concerns with the methodology and corresponding assessment of Green Belt parcels.

However, Freeth's report has been undertaken and reviewed in light of the August 2026 NPPF and its policies in relation to green belt and grey belt which is now more permissive approach to identifying and developing grey belt in the context of a 'pro growth' agenda. It is not surprising that given this skewed nature of government guidance, some of the sites identified in the GBA as potential grey belt are also identified as such by Freeths.

The Freeth report reviewed 25 larger Green Belt areas around Sutton Coldfield that were identified in the GBA. The GBA identified 18 of these as potential grey belt areas and the Freeth report considers that only 13 should currently be treated as potential grey belt, and even that number may reduce once further assessment is carried out. The Freeth report also reviewed 19 specific sites. The GBA identified 17 of these as potential grey belt sites but the Freeth report considers that only 10 should currently be treated as potential grey belt, again subject to further work.

JL explained that the key issue is how the GBA assessed whether land helps to prevent urban sprawl. Urban sprawl means the outward spread of built development into the countryside. The GBA's approach appears to assume that land must be physically joined to the built-up area in order to perform this role. The Freeth report does not agree with that approach. Land can still help prevent outward spread even if it is close to, rather than directly attached to, the existing urban area. This is important because it affects how many areas and sites are identified as potential grey belt. The GBA also includes a Green Belt Impact Assessment for each site. This looks at whether releasing land from the Green Belt would harm the role and strength of the wider Green Belt. Where the GBA concludes that release would cause no harm, the site is taken forward for further consideration. In a number of cases, sites have been taken forward even though the GBA says that they make a strong contribution to the purposes of the Green Belt. The Freeth report concludes that this is inconsistent and the reasons for taking those sites forward are not clearly explained.

The GBA also identifies some areas around Sutton Coldfield as being of "fundamental importance" to the Green Belt. These are areas which BCC itself recognises as playing a particularly important role in controlling unrestricted sprawl and protecting the countryside from encroachment. However, those areas do not appear to have been taken into account as part of the Impact Assessment. The Freeth report identifies this to be a fundamental flaw in the methodology.

In summary, the Freeth report concludes that the GBA has unjustifiably identified certain parcels/sites around Sutton Coldfield as potential grey belt or suitable for further consideration. Overall, JL noted that further work would be needed before the GBA can be relied on to inform decisions about Green Belt release through the Local Plan.

JL explained that it is important to note that the Freeth Report only considered the parcels and sites identified in Figure 5 (Green Belt Parcels) and Figure 8 (Green Belt Sites for Assessment) of the GBA. The conclusions reached for each parcel and site relate solely to the specific area assessed and the extent to which that area contributes to the purposes of the Green Belt. The conclusions should not be automatically applied to any alternative site area, even where that area overlaps with a parcel or site considered in the report. This is because the assessment of parcels/sites in the GBA are

inherently parcel/site specific, with conclusions influenced by factors such as site boundaries, physical features, containment and the relationship of the site to the existing settlement pattern.

Whilst the Town Council's concerns about the robustness of the methodology and approach underpinning the GBA was endorsed by the Freeth Report, it is positive to note that the BPP is now not proceeding with any grey belt designations and is proposing to retain the existing Green Belt boundary within Sutton Coldfield (notwithstanding the previously removed areas of Green Belt to accommodate both Peddimore & Langley SUE).

Turning to BPP policies relating to regenerating Sutton Coldfield town centre, JL set out that the Town Council has broadly supported the approach of the Local Plan to date.

Since the publication of the FPOD the Town Council's Head of Regeneration & Sustainability has been working with BCC Local Plan Officers to explore opportunities for the plan's town centre related policies to better reflect the aspirations of the Town Centre Masterplan SPD. Committee will recall at its June 2nd 2026 meeting approving a request for Town Council Officers be delegated to continue to work with Birmingham City Council Officers to progress relevant Sutton Coldfield Town Centre Masterplan SPD policies for incorporation within the next iteration of the Birmingham Local Plan whilst exploring alternative planning options to take forward any remaining aspects of the SPD.

It is therefore positive to note that the Town Council's Head of Regeneration & Sustainability's suggested changes are incorporated within the BPP. It is considered there are still some minor amendments which could be made to improve the deliverability (and therefore the soundness) of aspects of the policies which are set out in Section 5 of the Report.

Other areas of interest within the BPP relate to site allocations and proposed densities for new residential development. Whilst the Town Council broadly considers the allocations and proposed delivery approach of the Langley SUE, Peddimore employment site and sites within Sutton Coldfield town centre to be sound, concerns have been previously raised regarding the densities being too prescriptive and not recognising other factors relating to the individual site assessment of a site's context, proposed height, scale and quality of the design and materials, proximity to open space and sustainable travel.

The Sutton Coldfield town centre site allocations set out an indicative minimum dwellings capacity which is of a higher density compared to other areas of the town. This is to be expected given its sustainable location and the resultant densities could also assist with protecting against any future proposals/need for Green Belt land release. Whilst the indicative minimum capacities for the identified key town centre sites appear more reasonable compared to previous proposals for sites, and therefore are generally supported, it is important to note these figures are expressed as 'minimum capacities'. These should only be increased subject to individual site assessment of a site's context, proposed height, scale and quality of the design and materials, proximity to open space and sustainable travel links and should be confirmed in subsequent planning platforms including site specific masterplans, supplementary plans and/or a Design Code.

Likewise, the Langley SUE and Peddimore allocations are supported provided they deliver improvements to transport connectivity including to and from Sutton Coldfield town centre to improve the overall sustainability of these allocations

Policy HN4 of the BPP sets out an approach for building at higher densities to make more effective and efficient use of land to support the growth strategy's brownfield first principle. The suggested target densities, which are higher within 400m of Urban Centres (including Sutton Coldfield town centre and the network of centres within the Royal Town) and areas well served by public transport with lower densities elsewhere can be broadly supported and considered a sound approach.

Policy HN4 also stipulates that in assessing the suitability of development densities, full consideration will need to be given to the site and context and that lower densities could be appropriate to preserve the local character of the area. This approach is supported to ensure proposals are responsive to their context; particularly within the town centre and in proximity with historic and natural assets.

JL concluded his summary by referring to Section 5 of the Report which sets out the suggested wording for the Town Council's response to the consultation.

Cllr Allen asked for clarification between Green Belt and Grey Belt to which JL advised that Green Belt land is land identified as contributing to the 5 strategic purposes with the fundamental idea is to keep the land permanently open and prevent urban sprawl. Grey Belt is a relatively new category of land within the Green Belt. The August NPPF has changed the Green Belt rules, in particular the definition of grey belt which now represents a new route for approval for housing and mixed used development.

In regards to local housing needs, Cllr Auton asked if the BLP will comply with the 2024 version of the NPPF and its stated local housing requirements. JL advised that he understood that as BCC are intending to submit the Local Plan under the "old plan making process" then providing it is submitted by December 31st this year, the transitional arrangements set out in the NPPF apply and the Local Plan will be assessed against the 2024 NPPF. This would need to be clarified by BCC planners.

Cllr Allen asked what the potential implications on the Greenbelt would be should Langley SUE not be delivered. JL responded and explained that this could be a potential factor to justify speculative development if it is demonstrated that BCC is not achieving its housing delivery targets.

Cllr Auton asked what influence the Sutton Coldfield Town Centre Masterplan SPD would have over the BLP. JL advised that the Sutton Coldfield Town Centre Masterplan SPD will remain as a material consideration when determining planning applications until it is replaced in the future. JL reiterated that aligning the strategic objectives of the Masterplan within Local Plan policies should give them more weight and longevity.

Lastly, Cllr Auton suggested it would be appropriate, given the age demographic throughout the town, that, in regards to wheelchair accessibility of new homes, that this is subject to regular review to reflect future changing demographics.

Committee all agreed that they support the policy, in particular that, all new housing development should be built to Part M4(2) standard and at least a 10% proportion of new homes on major development sites to be M4(3A) wheelchair accessible based on the clear need to increase the supply of accessible dwellings and wheelchair user dwellings.

Resolved that the following be inserted 'and this is subject to a regular review to reflect changing demographics' to ensure the percentage is amended to reflect the changing demographics and needs over the period of the Local Plan and submitted as a response to the BPP.

Resolved to respond to the consultation as follows:

Generally, the Town Council considers the BPP to meet the 'four tests of Soundness' albeit amendments have been identified to improve its soundness under the headings set out within this section of the Report.

The proposed development's strategy's focus on accommodating housing and employment growth within the city's existing urban boundary through Growth Zones, site regeneration and the development of existing site allocations including the Langley SUE and Peddimore Employment Area is considered to achieve the 4 tests of soundness; in relation to it being positively prepared, justified, effective and consistent with national policy. It represents an appropriate sustainable approach to accommodating new growth to help address deprivation through increasing access to employment opportunities.

The focus on town centre regeneration and allocation of development sites is also supported to bring forward housing at appropriate housing densities.

It is positive to note that as a consequence of a change to the methodology for calculating employment land needs means Birmingham is able to maintain a 5 year reservoir of readily available employment land to meet the development needs on an ongoing basis over the plan period. This, together with the ability to deliver future housing growth within the existing urban area (and at Langley SUE) negates the justification for any Green Belt land release or the identification of potential 'grey belt'.

Retaining and protecting the existing Green Belt boundary is welcomed by the Town Council and supports the BPP's overall focusing of development predominantly within the existing urban area through the regeneration of brownfield land, as set out in Policy PG2 and therefore is considered a 'sound approach' in terms of being positively prepared, justified, effective and consistent with national policy.

However, it is important to note the GBA which identified areas of the Green Belt for consideration as potential grey belt is published and forms part of the evidence of the Local Plan and could potentially be used to undermine this strategy by both developers to justify speculative planning applications and to meet the unmet needs of adjoining authorities and the wider West Midlands sub region.

As BCC has not proposed revising the Green Belt boundaries or allocating any sites within it, the Town Council does not consider its serious concerns over the GBA methodology affects the soundness of the Plan. The Town Council does however consider that BCC should undertake a review of the GBA as soon as possible to address the conclusions of the Freeth report which is being formally submitted with this consultation response. In the meantime, until that further work is undertaken the GBA conclusions should be treated with extreme caution and should not be relied upon as a basis for Local Plan site selection or for Development Management purposes in relation to speculative planning applications.

The inclusion of both Sutton Coldfield town centre and Boldmere local centre within the Centres for Change policy, alongside the retention of the revised town centre boundary is

welcomed. It is considered this helps strengthen the approach for new development to be located within both centres and strongly aligns with the hierarchy of Birmingham centres and national policy for centres and is therefore considered, meets the four tests of soundness.

The inclusion of town centre allocations is also supported on the basis of alignment with the Masterplan.

The wording of the policy is supported with the BPP being more detailed and delivery-focused than the FPOD. For Sutton Coldfield, the introduction and vision has been expanded and provides stronger alignment with the adopted Town Centre Masterplan SPD, including greater reference to the six character areas and associated design principles. This strengthens the status of the Masterplan and demonstrates a holistic approach, which is welcomed.

The previous FPOD stated that car parking provision will be consolidated, whereas the Regulation 19 Plan states that a new parking strategy may identify opportunities for consolidation. This more evidence-led approach is welcomed and recognises the need to understand existing parking provision before decisions are made.

Connectivity proposals are more ambitious and delivery-focused than the previous iteration, particularly in relation to integration between rail, bus, walking, wheeling and cycling networks alongside the explicit commitment to delivering the Sutton Coldfield Gateway project. This overall refocus on delivery is considered to improve the soundness of the policy; particularly in terms of being justified and effective.

However, the town centre site allocations shown in the Table on Page 247 all still show an expected plan phasing period of 6-10 years. This is considered to be unrealistic as it is highly unlikely these would all be happening around the same period. It is disappointing to note that at least one opportunity isn't shown as being brought forward before then. This should be revised to reflect a more realistic delivery timescale and improve its soundness in terms of being positively prepared and effective.

The suggested target densities, which are higher within 400m of Urban Centres (which would include Sutton Coldfield Town Centre, Mere Green, New Oscott, Boldmere, Walmley & Wylde Green) and areas well served by public transport with lower densities elsewhere can be broadly supported and considered to achieve the tests of soundness in terms of being positively prepared, justified, effective and consistent with national policy.

The proposed caveat attached to the policy which states that higher densities should be accompanied by high quality design proposals and ensuring the impact of its surroundings is fully considered could be strengthened by substituting 'should' with 'must'. This would ensure that proposals in sensitive locations such as Sutton Coldfield town centre are of high design quality and well considered.

Policy HN4 also stipulates that in assessing the suitability of development densities, full consideration will need to be given to the site and context and that lower densities could be appropriate to preserve the local character of the area. This approach is supported to ensure proposals are responsive to their context; particularly within the town centre and in proximity to historic and natural assets

55 Date of Next Meeting

Committee to note that the next meeting will take place on Tuesday 6 October, 6pm Trinity Centre.

Meeting closed: 19:25

Signed:

Date:

DRAFT