

Press Release
Housing organisations raise alarm over Birmingham Local Plan

On September 24 Birmingham City Council closed their consultation on the Birmingham Local Plan. The Birmingham Local Plan will guide development across the city up to 2044. This version of the plan looks into affordable housing commitments, locations for regeneration, potential infrastructure requirements and the environmental impact of planning.

However a coalition of housing organisations from across the city are raising the alarm bells as to what this local plan means for housing and communities in the city, particularly on the watering down of affordability commitments. The coalition has been quickly formed by organisations across the city and beyond: ACORN Community Union, Birmingham Fair Housing Campaign, Ladywood Unite, Druids Heath and Monymhull Neighbourhood Forum, Save Smallbrook Queensway. The organisations have been meeting to prepare a joint statement and submission highlighting the worries around the new plan.

The figures are stark, over 31,000 families are waiting on the council housing waiting list, 63,100 households have been identified as living in unsuitable accommodation, 13,300 households have no accommodation and there is a need for almost 5,000 new affordable dwelling per year, with approximately 97% of this need arising from households unable to buy or rent privately.

The coalition has raised particular concerns around Birmingham City Council's plan to lower the affordable housing threshold from 35 to 20% in core areas across the city. The coalition argues that the Plan does not provide sufficient evidence or safeguards to demonstrate that the proposed lowering of the affordable housing threshold will result in the delivery of social housing provision needed to meet Birmingham's pressing housing needs.

Moreover, the coalition pointed out that the 2026 Plan also waters down some of the provisions contained in previous drafts of the Plan around community-led development and the securing of infrastructure and public benefits in regeneration areas.

The coalition also believes that the centrality of demolition to the Plan's approach to regeneration in Ladywood and Druids Heath is a major cause for concern, particularly given that the Plan provides no clear commitments to protecting communities' right to remain or safeguards for the retention of existing homes.

The coalition argues that, taken together, these shortcomings risk leaving the Local Plan unsound and inconsistent with the 2026 National Planning Policy Framework in relation to housing needs, plan-making expectations, infrastructure and community facilities. Without a change in direction, the coalition believes the Plan risks failing to address Birmingham's pressing housing crisis and undermining the ability of communities to determine and benefit from the development of the city.

Coalition Statement

The 2026 Plan is not only consistent with the 2024 proposal to lower the required affordable housing threshold from 35 to 20% in core areas across the city, but also waters down some of the provisions contained in previous drafts of the Plan around community-led development and securing infrastructure and public benefits in regeneration areas.

These changes come at a time when the city is facing a housing affordability crisis.

There are currently around 31,000 families waiting for a council home in Birmingham, alongside a significant backlog of applications awaiting assessment.

Actual delivery has fallen far short of this need. FOI data indicates that 22,483 homes were completed in Birmingham between 2020 and 2025, but only 762 were affordable rent and 407 were social rent. Approximately 95% of completions were therefore neither affordable rent nor social rent.

The underlying rationale for lowering the affordable housing threshold is that requiring less affordable housing may ultimately result in more social housing being delivered because more schemes will be considered viable. It is also argued that lowering the requirement would reduce the number of viability assessments submitted at the decision-making stage.

The problem is that the Plan provides little evidence that this trade-off will actually produce the intended outcomes.

This concern was already recognised by the Council in the 2024 Plan, which cited the findings of the Whole Plan Viability Assessment commissioned by Birmingham City Council: "The evidence found that there are more specific viability issues for affordable housing delivery, particularly within the City Core Zone and the Low Value zone and Medium Value (brownfield) Zone recommended that only 10% and 15% affordable housing targets respectively are deliverable here." (2024 Local Plan draft p.197)

The 2024 document recognised that these were "very low targets" (ibid) and that they would not be sufficient to meet the city's affordable housing needs. Yet the current version of the Plan does not introduce additional measures to ensure that lowering the requirement from 35% to 20% actually produces the hoped-for increase in affordable and social housing delivery. Instead, it continues to rely heavily on viability assessments (25.14), contradicting the Plan's stated

objective of reducing the number of viability assessments submitted at the planning application stage.

In failing to do so, the Local Plan is in contradiction with several provisions in the 2026 NPPF, in particular, HO5 about setting requirements “required to meet identified local needs”, the provision of appropriate evidence for plan-making (PM8), and the provisions of PM12 concerning developer contributions, namely maximising certainty and reducing the need for viability assessments to be submitted at the decision-making stage.

Meanwhile, community-led development has disappeared from the document as a Local Plan policy, despite being included in the 2025 version of the Local Plan. Why has this provision been removed? This omission also appears to be in contradiction with the 2026 NPPF, particularly Policy HO5 on meeting diverse housing needs and, more specifically, the national provisions concerning the identification of “plots for self and custom build housing and community-led development”

The Plan continues to recognise the importance of protecting and improving Birmingham’s existing housing stock and, in some respects, strengthens the wording of previous drafts. However, there is a potential gap between these objectives and the specific protection offered to existing housing, particularly family housing. The stronger protection proposed for existing two-, three- and four-bedroom dwellings against conversion into flats, HMOs and other forms of shared housing applies to conversions, but does not appear to provide equivalent protection where those homes are to be demolished. Why has equivalent protection not been included? The absence of such a provision appears to be in contradiction with the Local Plan’s own emphasis on protecting existing housing as a measure to address climate change, as well as NPPF Policy CC2 (Climate Change Mitigation), which concerns taking advantage of opportunities to reuse existing structures and materials to reduce carbon emissions.

Earlier provisions concerning infrastructure and services for communities in regeneration areas such as Ladywood and Druids Heath have increasingly become matters to be explored through masterplanning or delivered “where appropriate”, making them more discretionary and contingent. The Local Plan also provides no clarity about the affordable and social housing provisions in these two areas. This is particularly concerning given the central role of demolition in the current Local Plan’s approach to regeneration. This lack of detail represents a significant gap, particularly in light of the requirements of the 2026 NPPF concerning housing needs (HO5), spatial development strategies (PM1), plan-making expectations (PM2 and PM9), strategic sites (HO4), and infrastructure alignment, including transport (TR1), health (HC1), and community facilities (HC3).

We demand that:

- **If the Council considers a lower affordable housing requirement necessary for viability reasons, it should provide clear evidence that the proposed thresholds will result in greater *actual* delivery of affordable and social housing. This should be accompanied by stronger mechanisms, safeguards and enforceable requirements to ensure the delivery of affordable and social housing meets the city’s housing needs**

and to prevent agreed affordable and social housing provision at the decision-making stage from subsequently being reduced on viability grounds.

- The Plan should reinstate a clear policy framework for community-led housing and development, including mechanisms for identifying and supporting suitable sites and delivering the Council's stated ambition for community-led homes.
- The Plan should provide equivalent protection for existing housing where demolition and redevelopment are proposed and should demonstrate that redevelopment will not result in an unnecessary loss of suitable existing homes. The presumption should be towards retaining, retrofitting and adapting existing housing.
- The Plan should provide clearer and more enforceable requirements for the protection and retention of existing housing in Ladywood alongside the ambition to deliver 7,000 homes. These should include a clearly defined affordable and social housing contribution, appropriate infrastructure and green-space requirements, and mechanisms to ensure that community benefits are secured alongside housing delivery rather than being left primarily to subsequent masterplanning and negotiation. The Council should also demonstrate how local residents will have a meaningful role in shaping the regeneration and how redevelopment will address, rather than exacerbate, the area's existing housing needs.
- The Plan should provide greater certainty about the outcomes of the Druids Heath regeneration, including clear safeguards for the retention and protection of existing housing, arrangements for delivering social and affordable housing, the infrastructure and community facilities required to support the increased population, and the mechanisms through which these benefits will be secured. The Council should also demonstrate how existing residents will be protected and meaningfully involved throughout the regeneration process. Given the scale of demolition proposed, the Plan should ensure that regeneration delivers a clear and demonstrable benefit for existing as well as future residents.

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