

# **Birmingham Development Plan 2031**

Examination Hearing Statement on behalf of  
Richborough Estates

## **Matter H: Neighbourhoods and housing provision**

October 2014

**Turley**

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**LPA reference**

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# Executive Summary

1. This hearing statement is submitted by Turley on behalf of Richborough Estates in respect of their objections to the Birmingham Development Plan 2031 with reference to land at Fox Hill, Roughley.
2. It addresses Matter H: Neighbourhoods and housing provision (BDP policies TP26-27, TP29 & TP31-34), due to be heard on Wednesday 19 November.
3. Richborough Estates has made further submissions in respect of Matters A (Housing Need and the housing trajectory), D (Vision), E (Green Belt), and F (Duty to Cooperate).
4. The statement is set out as a response to the Inspector's Issues and Questions for Discussion as set out in the Programme for Hearing Sessions (version 2) dated 22 September 2014.

**Main issue: Does the Plan make adequate and appropriate provision to meet the identified housing needs, including the needs of gypsies and travellers?**

5. At a headline level, the plan does not make sufficient provision to meet identified housing needs, as it fails to specify how the full objectively assessed needs of the city will be met. The lack of any provision to meet the current shortfall of housing need that cannot be met in Birmingham means that the Council's 5 year requirement is flawed.
6. Whilst the SHLAA shows a spread of supply over the three periods as required by the NPPF, there is uncertainty about how needs in later years will be met, with a dwindling supply of sites in high market value areas and an increasing reliance on high density schemes in the city centre and inner urban areas.
7. Analysis of the size and location of sites in the SHLAA raise fears that the required mix of housing arising from the SHMA cannot be met over time, and that the minimum density requirements will also mitigate against delivering family housing, particularly in the SUE and other high market value areas.
8. There is a significant risk that the policies on housing provision will not be effective.

# 1. Q1 a) As required by NPPF paragraph 47, have the Council identified a five-year supply of specific deliverable housing sites?

1.1 At face value, it appears as though the Council has a 5.9 year supply as at April 2014 but we believe that other perspectives should be considered:

- The BDP requirement only meets 61% of Birmingham's needs and no other authority is currently providing for the 39% of unmet needs within the next 5 years. If the full picture (even based on the draft BDP) was considered, the city only has a 3.6 year supply
- If the Inspector agrees that the BDP requirement should be higher than the 51,100 currently proposed, the 5 year calculation would change and the years supply would decrease and would fall below 5 years
- The Council claims to be a 5% authority on the basis of past performance but there are other scenarios which suggest they might need a 20% buffer

1.2 The Council has recently published an updated Five Year Land Supply statement covering the period 2014-19 which shows net completions over the first three years of the plan period have been 4,157 at an average of 1,385 dpa, slightly over the stepped BDP trajectory of 1,300 dpa, with a rising trend post-recession.

1.3 Table 5.1 in the statement shows that net completions over the last 10 years (from 2004-14) have averaged 1,895, with a range from 933 in 2009/10 to 3,141 in 2005/06.

1.4 The statement goes on to show that, based on a 5% buffer requirement of 11,865, there is a 5.9 year supply of 14,041 comprising SHLAA sites (11,881) and windfalls (2,160).

## **Meeting Birmingham's full needs**

1.5 However, this requirement is based on the draft BDP provision of 51,100 dwellings over the plan period 2011-31. Of course, the city's housing need is at least 84,000 and possibly much higher (see Matter A hearing statement). In providing for only 61% of the city's needs, there is a shortfall of circa 33,000 (or 39% of the total need), a proportion of which exists now.

1.6 There are currently no proposals for meeting this shortfall in any adjoining authority – neither that which has not been met between 2011 and 2014 nor the need from 2014 to 2019. If Birmingham's BDP requirement is 11,865 (including a 5% buffer), representing 61% of the city's needs, the 'shortfall' requirement should be 7,585 (equivalent to the missing 39%, assuming the same stepped trajectory adopted in the BDP).

1.7 The total housing requirement to meet all of Birmingham's needs over the period 2014-19 is therefore 19,450. The city's supply is 14,041 and there is no supply from any



adjoining authority to meet the 'shortfall' element of the requirement. Therefore, the city can only demonstrate a 3.6 year supply of land to meet its needs.

- 1.8 This is before any consideration of whether Birmingham's housing need is greater than the stated 84,000 (see our Matter A hearing statement) or interrogating the SHLAA to determine how realistic the sites included within the five year supply are.

### **A higher requirement**

- 1.9 If we accept the basis on which the Council has calculated its 5 year requirement, this assumes a provision within the city of 51,100 dwellings. If the requirement was to be increased to 56,100 as we suggest in our Matter A hearing statement because overall needs are likely to be more than 84,000, this would change the basis of calculation.

- 1.10 On the basis of a 56,100 requirement, the stepped trajectory would increase as follows:

2011-14 : From 1,300 to 1,400

2014-16 : From 1,900 to 2,125

2016-21 : From 2,500 to 2,750

2021-31 : From 3,090 to 3,390

- 1.11 Therefore, the 5 year requirement would be 12,500 (rather than 11,300), plus the 5% buffer gives 13,125 (instead of 11,865). With a total supply of 14,041, this would equate to a 5.3 year supply.

- 1.12 However, if this 56,100 was annualised (i.e. not stepped), the 5 year requirement would be 14,726 equating to a 4.8 year supply (instead of 5.2 on an annualised basis).

### **Basing the requirement on other scenarios**

- 1.13 The Council bases its 5 year requirement on the draft BDP, but considers performance against the UDP 1991-2011 and the RSS 2001-12, suggesting that targets have been exceeded. This is confirmed in the AMR 2013 at Table 3.10 which shows that up to 2009, a significant surplus was built up but performance since has fallen away.

- 1.14 We have considered two other scenarios more recent than the RSS which are relevant – the RS Panel Report of 2009 which recommended an increase in Birmingham's requirement but was never adopted, and the draft Core Strategy of December 2010 which was post-Panel Report but pre-NPPF. Both run from 2006 so we have compared all three over the 8 year period since then.

- 1.15 The RS Panel Report recommended an increase in Birmingham's net requirement to 57,500 from 2006-26 but acknowledged 700 would be in Bromsgrove District, so we have deducted that from the Panel figure to give an annualised requirement of 2,840. The draft Core Strategy adopted a stepped approach mid-recession although interestingly higher than that now in the draft BDP. Both clearly give a much higher requirement for the past 8 years than either the RSS or BDP and both therefore generate a shortfall over that period which, using the Sedgfield approach, should be added to the current five year requirement and may suggest a 20% buffer instead.

Year	Net completions	WMRSS net requirement (2001-2021)	RS Panel Report 2009	Draft Core Strategy 2010	Draft BDP 2013
2006/07	1,839	1,100	2,840	1,800	
2007/08	2,988	1,800	2,840	1,800	
2008/09	2,456	1,800	2,840	1,800	
2009/10	933	1,800	2,840	1,800	
2010/11	985	1,800	2,840	1,800	
2011/12	1,187	1,800	2,840	2,250	1,300
2012/13	1,372	1,800	2,840	2,250	1,300
2013/14	1,598	1,800	2,840	2,250	1,300
TOTALS	13,358	13,700	22,720	15,750	

**Q1 b) Have the Council identified a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15?**

- 1.16 The Council has been producing SHLAAs since 2008 but only those since 2010 include both commitments and sites with no planning status and are therefore broadly comparable. The total identified supply (excluding windfalls) in each SHLAA has been as follows:

2010 44,909

2011 37,227

2012 35,113

2014 38,395

- 1.17 The SHLAA 2014 shows the first increase in capacity since 2010. Of the total supply identified, roughly 31% is envisaged to come forward in the first 5 years (by 2019), about 37% between years 6-10 (2019-24), and 32% in the years beyond year 10 (post-2024). This is an even split over the three time ranges specified in the NPPF para 47.

- 1.18 However, the stepped trajectory means that next year, the 5 year requirement will increase again and by 2021, it will rise to over 16,000. At present, the SHLAA shows sites with the capacity for 14,192 in years 6-10 (2020-25). This then reduces to 12,144 beyond 10 years (2026 onwards). Given that the proposed Langley SUE is a large component of this longer term supply, with no further sites of this scale in the pipeline, it is difficult to see how the five year supply will be maintained through the later part of the plan period.

## 2. Q2: Is there reasonable certainty that a five-year supply of specific deliverable sites can be maintained throughout the Plan period?

- 2.1 On closer inspection of the SHLAA 2014 sites, we have concerns that the small number of bigger sites in high market value areas more appealing to the volume housebuilders and capable of delivering family housing will be exhausted early in the plan period, and the later years will be reliant on very high density sites in the city centre and inner urban wards, where competing land uses and a weak market may hamper deliverability. We consider that in order to maintain a five year supply of specific deliverable sites throughout the plan period, an additional large site should be removed from the Green Belt in Area B (including the site at Fox Hill, Roughley).
- 2.2 We have analysed the SHLAA 2014 sites by ward as well as identifying larger sites over 100 dwellings, relating them where possible to the High Residential Market Value Areas in the draft CIL Charging Schedule (see our Appendix 1).

### **Analysis by Ward**

- 2.3 There are 40 wards in Birmingham. If each ward had an equal distribution of SHLAA capacity, it would accommodate 2.5% of the total identified supply. Only six wards exceed 2.5%:
- Aston (4.6%)
  - Ladywood (15.8%)
  - Longbridge (4.6%)
  - Nechells (17.6%)
  - Soho (2.9%)
  - Sutton New Hall (13.8%)
- 2.4 Ladywood and Nechells cover the western and eastern parts of the city centre respectively, where high density city living makes up the majority of SHLAA sites.
- 2.5 Aston and Soho are wards immediately north of the city centre, in what are low market value areas.
- 2.6 Therefore, over 40% of the total SHLAA supply is concentrated in the city centre and inner urban wards.
- 2.7 Longbridge is a suburban growth area, being actively regenerated by St Modwen in response to the Rover works closure, not high value but capable of generating its own market.

- 2.8 Sutton New Hall is the only high residential market value area and appears in this list because it includes the 5,000 capacity Langley SUE.
- 2.9 The remaining high residential market value areas fall within the following wards (percentage of total supply in brackets):
- Bournville (2.2%)
  - Brandwood (1.2%)
  - Edgbaston (2.1%)
  - Harborne (0.9%)
  - Selly Oak (0.7%)
  - Sutton Four Oaks (0.3%)
  - Sutton Trinity (2.1%)
  - Sutton Vesey (0.2%)
  - Weoley (1.4%)
- 2.10 The most attractive residential market value wards (excluding the Langley SUE) therefore make up only about 11% of the total SHLAA supply, rising to 25% when Langley is added.

### **Large Sites**

- 2.11 The SHMA 2012 identified that 70% of the city's housing need would be for market housing (see Appendix 3) which, by and large, is provided by volume housebuilders, whilst recognising the very important role played by smaller builders and specialist residential or mixed use developers. The volume housebuilders will target markets where demand is strong, for a range of house types, typically the family housing market of 2, 3 and 4 bed houses, which generally dictates densities of between 30-40 dph.
- 2.12 Our analysis, and that of Savills, of the SHLAA 2014 sites shows that there is a distinct lack of sites suitable and appealing for volume housebuilders.
- 2.13 There are only 91 sites over 100 dwellings capacity identified in the SHLAA. Of these, only 11 including Langley are in the ten wards mentioned above as high market value areas (see our Appendix 1).
- 2.14 Analysis by Savills in Appendix 2 estimates that, of the larger sites over 100 dwellings, only 32 are of a density appropriate for and attractive to the volume housebuilders (see also our later comments on housing mix).
- 2.15 60% of those sites are allocated in the first five years (2014-19), and this is prior to analysis of whether they are in attractive market locations.

- 2.16 There is a risk that the volume housebuilders will have little to interest them in Birmingham other than the Langley SUE in the second half of the plan period.
- 2.17 By contrast, 39 sites over 100 dwellings are located in Ladywood and Nechells, the city centre/inner urban wards. Most of these are proposed to be developed at densities well in excess of 100 dph (many between 300-600 dph and one as much as 900 dph), providing in total 9,351 dwellings capacity (25% of the total SHLAA supply on just 39 high density sites in two wards). That is as much as the total capacity on all sites in the ten high market value wards.
- 2.18 There are positive signs of a resurgence in city living and it is to be hoped that these sites are built out, however, there is a risk that future supply will be disproportionately meeting only one part of the city's housing needs. This is shown by the fact that 55% of the supply in Nechells ward is in the >10 years category, suggesting there is less confidence in these sites coming forward. By contrast, only 36% of the supply in the nine high market value wards is in the >10 year category and the majority of that is in the Langley SUE.

### **3. Q3: Is policy TP27 justified in requiring infrastructure to be put in place before new housing is provided?**

- 3.1 There is an important distinction between development that will be liable for CIL going forward, contrasting with the SUE at Langley, which will be subject to Section 106 obligations more specifically tailored to the infrastructure requirements of the development itself. The Council can therefore have more confidence in the delivery of infrastructure in advance of new housing being provided in the SUE, and therefore, extending the SUE as we propose would ensure early delivery. An SUE is able to finance the physical and community infrastructure required through the timing of payments and limits on house completions, whereas numerous smaller sites all paying CIL cannot be guaranteed to deliver the infrastructure required before each is commenced.

## 4. Q4 a) Are the provisions of policy TP29 adequate to ensure the provision of a mix of housing to meet the needs of different groups in the community?

- 4.1 The policy seeks to deliver a range of dwellings to meet needs and support the creation of mixed, balanced and sustainable neighbourhoods consistent with para 50 of the NPPF. Account will be taken of the SHMA, detailed local assessments, demography and the circumstances of sites.
- 4.2 There are obvious overlaps with Q5 on densities, as much of the detail in Policy TP29 is about densities in three categories of location and where exceptions might be made, in particular to provide family housing in the city centre. However, we have concerns that the SHMA identifies a high proportion of the need for 4-bed houses and with our previous comments about the disproportionate number of small high density city centre and inner urban sites, there is a risk that the policy intentions will not be met by a lack of suitable sites to meet the full range of need.
- 4.3 The HDH Planning and Development presentation of the 2012 SHMA (Appendix 3) shows that 35% of the market housing requirement is for 4 bed houses and 49% of social rented. In total, over 25,000 4 bed houses will be required over the plan period.
- 4.4 It has long been recognised that the city is short of sites suitable to accommodate family housing and particularly larger house types. The Birmingham Local Investment Plan 2010-2014, for instance, at para 8.1 recognised the city's housing imbalance stating:
- There is recognition of the need to redress the City Centre/suburban split of development in future years.*
- 4.5 In order to deliver this scale of larger family housing, the volume housebuilding industry requires sites of over 100 dwellings at densities lower than 35 dph in medium to high value market areas. The Langleigh SUE is one such example but only has capacity for 5,000 (20% of the total requirement for 4 bed houses over the plan period).
- 4.6 Only 7% of all sites in the SHLAA 2014 can accommodate over 100 dwellings and we have already seen how few of these are in high value market areas. We cannot see how the plan can provide an adequate mix of house types to meet the needs of all parts of the community.

### **Q4 b) Is the policy sufficiently flexible to ensure its effectiveness?**

- 4.7 See our comments on density in Q5.

## **5. Q5: Are the density requirements of policy TP29 justified?**

- 5.1 Our principal concern about the density requirements in policy TP29 is that the minimum of 40 dph is not appropriate for many suburban and peripheral locations where volume housebuilders are expected to deliver large numbers of 4 bed family houses. Such densities run counter to the urban fabric and characteristics of suburban and peripheral locations.
- 5.2 Savills provide examples in Appendix 4 of 11 recently sold sites across the West Midlands offering family housing, which illustrates that typical densities are around 30 dph, rarely higher. Policy TP29 will not enable the delivery of family housing densities and quality, sustainable environments.



## 6. Q6

6.1 No response

## 7. Q7

7.1 No response

## **8. Q8: Are these policies effectively drafted to achieve their intended purpose and do they provide a clear indication of how a decision-maker should react to a development proposal?**

- 8.1 These policies collectively identify insufficient sites to deliver family housing which is the majority requirement in the SHMA, particularly with a mix including a high proportion of 4 bed houses. Much too great a reliance is placed on high density inner urban sites which, although it is to be hoped that they deliver the numbers required, will not meet the full range of house type and density requirements. Consequently the volume housebuilders who are critical to boosting delivery of housing in Birmingham will not be able to find sufficient sites to satisfy their needs or to meet market demand.

# Appendix 1: SHLAA 2014 Sites by Ward

Breakdown of SHLAA Sites by Ward (source: SHLAA 2014)

Ward	No of sites	Sites > 100	< 5 years	6-10 years	> 10 years	Total Supply	%
Acocks Green	35	1	144	426	12	582	1.5
Aston	56	6	555	515	700	1770	4.6
Bartley Green	24	1	293	160	37	490	1.3
Billesley	16	0	47	84	25	156	0.4
Bordesley Green	22	0	41	101	0	142	0.4
<i>Bournville</i>	<i>13</i>	<i>1</i>	<i>255</i>	<i>325</i>	<i>280</i>	<i>860</i>	<i>2.2</i>
Brandwood	25	1	127	305	36	468	1.2
Edgbaston	41	2	599	160	47	806	2.1
Erdington	42	4	679	292	2	973	2.5
Hall Green	25	0	73	185	0	258	0.7
Handsworth Wood	31	1	187	65	65	317	0.8
<i>Harborne</i>	<i>30</i>	<i>0</i>	<i>224</i>	<i>100</i>	<i>10</i>	<i>334</i>	<i>0.9</i>
Hodge Hill	35	0	111	130	25	266	0.7
Kings Norton	23	0	236	74	0	310	0.8
Kingstanding	19	1	332	41	3	376	1.0
Ladywood	118	16	1947	2141	1952	6040	15.8
Longbridge	21	5	978	620	174	1772	4.6
Lozells & E Handsworth	69	3	292	502	45	839	2.2
Moseley & Kings Heath	45	0	149	91	0	240	0.6
Nechells	83	23	1013	2007	3699	6719	17.6
Northfield	20	0	172	43	25	240	0.6
Oscott	25	1	230	97	164	491	1.3
Perry Barr	12	3	66	525	24	615	1.6
Quinton	21	1	154	50	65	269	0.7
<i>Selly Oak</i>	<i>25</i>	<i>0</i>	<i>211</i>	<i>61</i>	<i>11</i>	<i>283</i>	<i>0.7</i>
Shard End	31	1	190	348	21	559	1.5
Sheldon	20	2	401	38	82	521	1.4

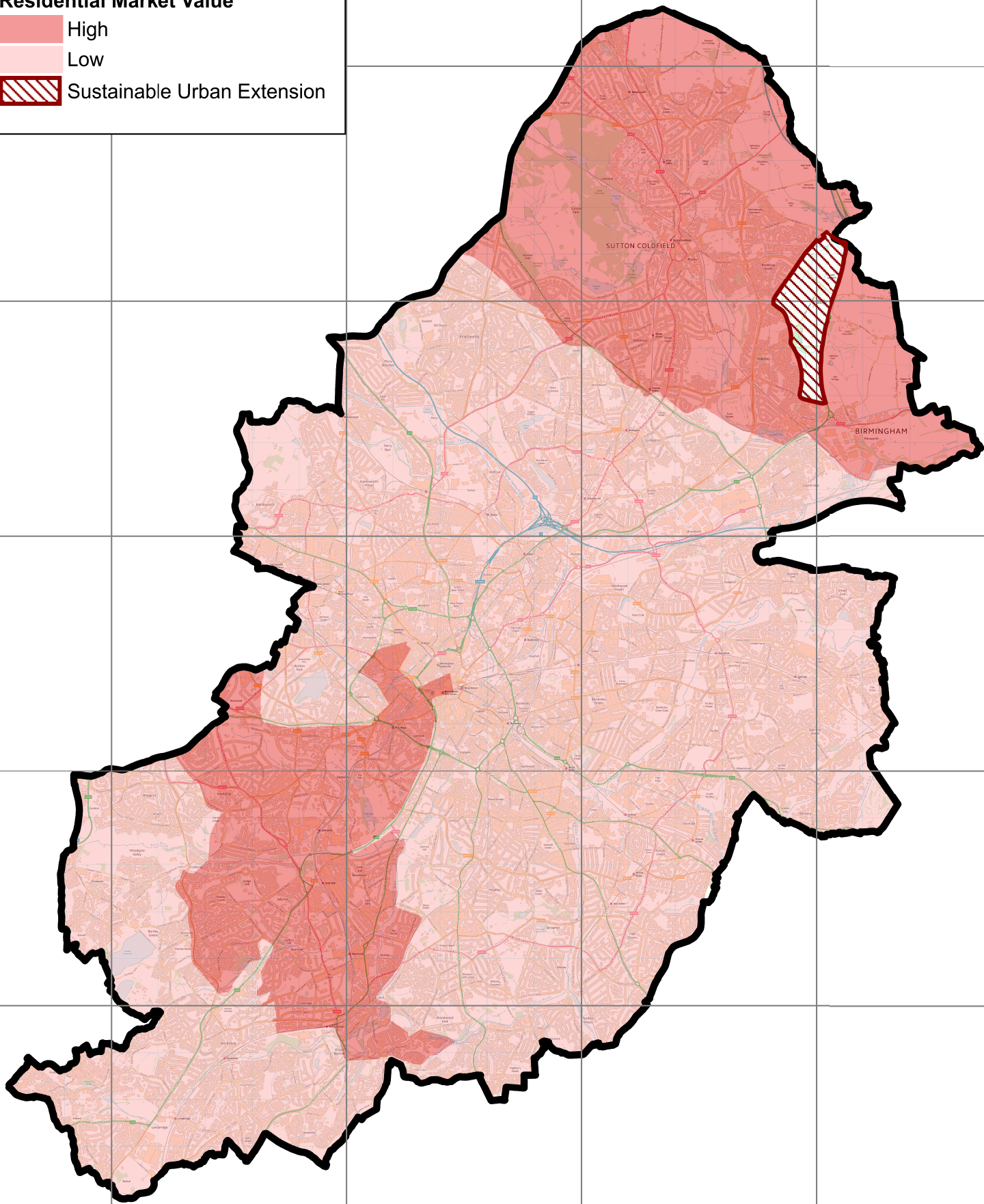
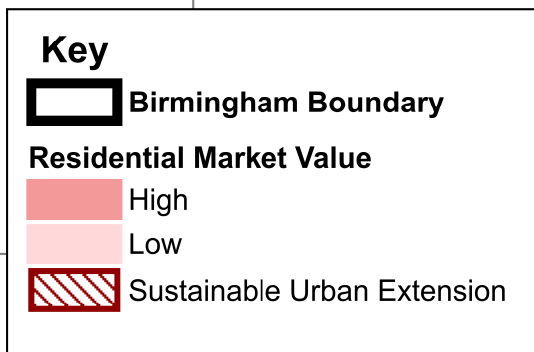
Ward	No of sites	Sites > 100	< 5 years	6-10 years	> 10 years	Total Supply	%
Soho	38	1	-71	312	883	1124	2.9
South Yardley	24	0	24	241	54	319	0.8
Sparkbrook	47	1	59	74	274	407	1.1
Springfield	28	3	293	537	0	830	2.2
Stechford & Yardley North	21	3	175	428	14	617	1.6
Stockland Green	39	1	248	203	113	564	1.5
<i>Sutton Four Oaks</i>	<i>41</i>	<i>0</i>	<i>48</i>	<i>44</i>	<i>38</i>	<i>130</i>	<i>0.3</i>
<i>Sutton New Hall</i>	<i>30</i>	<i>2*</i>	<i>426</i>	<i>2021</i>	<i>2818</i>	<i>5265</i>	<i>13.8</i>
<i>Sutton Trinity</i>	<i>44</i>	<i>2</i>	<i>355</i>	<i>219</i>	<i>238</i>	<i>812</i>	<i>2.1</i>
<i>Sutton Vesey</i>	<i>21</i>	<i>0</i>	<i>28</i>	<i>41</i>	<i>2</i>	<i>71</i>	<i>0.2</i>
Tyburn	17	1	48	334	185	567	1.5
Washwood Heath	28	1	163	109	21	293	0.8
<i>Weoley</i>	<i>10</i>	<i>3</i>	<i>388</i>	<i>143</i>	<i>0</i>	<i>531</i>	<i>1.4</i>
<b>Totals</b>	<b>1315</b>	<b>91</b>	<b>11890</b>	<b>14192</b>	<b>12144</b>	<b>38226</b>	

\* including Langley SUE

The High Residential Market Value wards are highlighted in italics

# Birmingham Residential Market Value Areas

APPENDIX 4



## Appendix 2: SHLAA Sites Suitable for Volume Housebuilders

District	Plots & Time				Sites & Time			
	< 5	6–10	>10	Total	< 5	6-10	> 10	Total
Acocks Green		100		100		1		1
Aston	168		100	268	1		1	2
Bartley Green	112			112	1			1
Bournville	120	250	280	650	1	x	X	1
Erdington	420	250		670	3	1		4
Handsworth Wood	155			155	1			1
Kingstanding	166			166	1			1
Ladywood	301	475	174	1050	2	1x	1x	4
Nechells		106		106		1		1
Perry Barr		402		402		3		3
Quinton	121			121	1			1
Shard End	132	168		300	1	x		1
Sheldon	121			121	1			1
Sparkbrook			240	240			1	1
Springfield		224		224		2		2
Stechford and Yardley	124	51		175	1	x		1
Stockland Green	128			128	1			1
Sutton New Hall	370	1975	2765	5110	2	x	X	2
Sutton Trinity			150	150			1	1
Washwood Heath	119			119	1			1
Weoley	130			130	1			1
<b>TOTAL</b>	<b>2687</b>	<b>4001</b>	<b>3709</b>	<b>10397</b>	<b>19</b>	<b>9x</b>	<b>4x</b>	<b>32</b>

This analysis by Savills is an approximate picture of the SHLAA sites that would meet the usual criteria of volume housebuilders, ignoring market quality of sites. Each site is over 100 plots, enabling continuity and economies of scale. Densities are up to 40 dph, although housebuilders prefer no higher than 30 to 35 dph. There is no discrimination across wards despite some not be being volume housebuilder markets i.e. Nechells.

x = includes in totals, sites of a size that results in them continuing across Plan periods, Langley SUE for example.

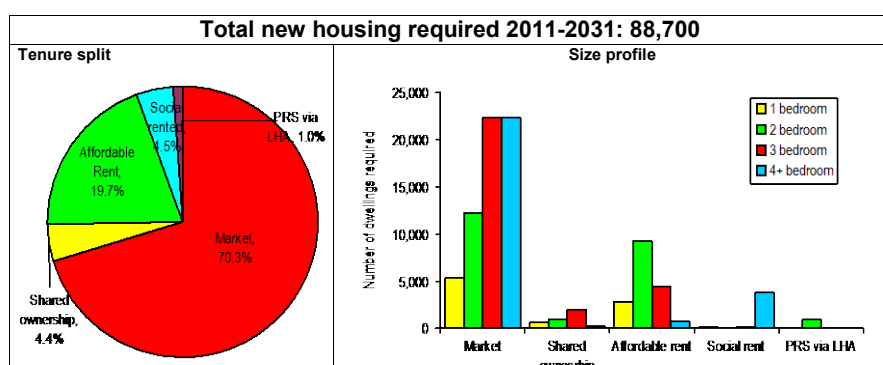
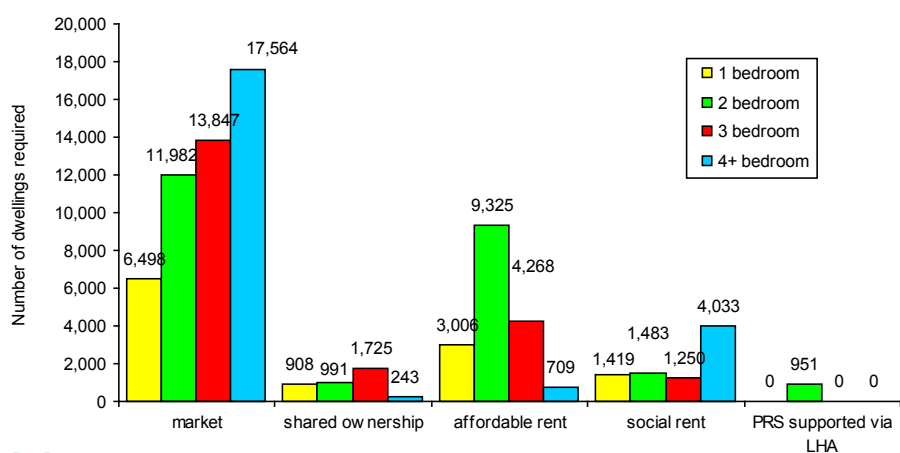
- A. SHLAA comprises 1,315 sites in total.
- B. 91 SHLAA sites are >100 plots each (c25,000 capacity), of these only 32 (10,497 plots) fit volume house builder criteria, prior to further analysis on the strength of the market locations.
- C. Only 19 volume sites > 100 plots are deliverable in < 5 years

Source: Savills (Birmingham)

## Appendix 3: SHMA Key Findings

Extract from HDH presentation on the SHMA in 2012

Size of new accommodation required by 2031 (by tenure)  
(2008-based projections)





## Appendix 4: Housing densities

The table below shows housing densities on sites recently sold by Savills to volume housebuilders. Housing mix on these sites is predominantly three and four bedroom detached family housing, with a few exceptions having high numbers of two and three bedroom houses.

Site Address/ Area	Planning Permission Decision Date	No. Units	Size (Acres)	Size (Hectares)	Density per Hectare
Coombs Road, Halesowen	2010 / 2011	70	5.00	2.02	35
New Century Park, Coventry	2010 / 2011	376	26.60	10.77	35
Tansey Green Road, Pensnett	2011	323	28.44	11.51	28
Dark Lane, Broseley	2012	94	8.00	3.24	29
Weston Hall Road, Stoke Prior	2013	157	19.43	7.86	20
Coppice Green Lane, Shifnal	2013	200	18.15	7.34	27
Land at Burntwood, Lichfield	2014	366	23.70	9.59	38
Haygate Road Wellington	2014	330	37.74	15.27	22
Newtown Road, Worcester	2014	61	6.08	2.46	25
The Ring, Great Haywood	2014	76	7.71	3.12	24
Stafford Road, Eccleshall	2014	130	11.12	4.5	29

Source: Savills (Birmingham)

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