

Appendix C – List of key matters and issues

Matters and Issues – Discussion Paper

Matter 1 – Overall strategy, the economy and transport (Policies R1-7; IR; MU1-5; and LC1-6)

Issues

1.1 Relationship to other plans and strategies:

- (i) What are the implications of adopting the Aston, Newtown and Lozells Action Area Plan (AAP) ahead of the **Birmingham Core Strategy**? Do any issues cast doubt on a smooth relationship between the two plans?
- (ii) What should be the relationship between the AAP and the adopted **Birmingham UDP**? Is it sufficient for the AAP just to refer to the UDP open space standards, or should the AAP have other important policy hooks?
- (iii) What has been the role of the **Birmingham Sustainable Community Strategy** in informing and guiding the AAP?

A **situation update** from the Council is required in relation to points (i) to (iii).

Commentary:

(i) **Birmingham City Council (BCC)** considers there are no issues which cast doubt on the appropriateness of adopting the AAP in advance of the Core Strategy (CS); Longbridge AAP has been adopted successfully to advance key development proposals without delaying progress. RIS concept stems from W Midlands Regional Spatial Strategy (RSS), with strong evidence base.

-AAP also links into the CS housing requirement.

-CS concept of District Centre Growth Points reflected in Perry Barr proposal.

(ii) **BCC** states that the AAP continues the 3 key themes of the UDP – economic revitalisation; urban and social renewal; and environmental quality – through its policies and proposals, and including the brownfield emphasis recommended by the UDP Inspector. Not necessary to refer to city wide policies in UDP.

(iii) **BCC** – AAP addresses the 5 key outcomes of the Sustainable Community Strategy (SCS) – succeed economically; stay safe; green city; be healthy; and enjoy high quality of life.

Inspector's comments:

(i) The Aston RIS is located in East Birmingham, whereas RSS proposed a RIS in West Birmingham. What is the locational reasoning behind the AAP proposed RIS?
-Housing figures need to be net rather than gross (or both).

(ii) Whilst agreeing with BCC's approach, there still appears to be an inconsistency between no references to the UDP in section 5 – Housing – whilst there are several references to the UDP in section 7 – Environment.

1.2 How does the AAP relate to the main recommendations of the **Sustainability Appraisal (SA)** (NTS6)? Are there any areas of conflict, and if so, how have they been resolved?

Commentary: BCC – AAP attempts to address the potential issues highlighted by the SA at the earlier options stage, including:

- Open space strategy, encouraging green links, and esp. River Tame corridor.
- Policies to address bio-diversity and water quality.
- Further flood risk modelling of Hockley Brook, to justify allocation of sites for development in Newtown area – and River Tame flood risk zones.

Inspector's comments: Is there still a SA issue re: sustainable waste management facilities?

1.3 Relationship to other areas: Should the AAP provide more focus on its relationship to neighbouring areas, including demonstrating on the plans the importance of such relationships, eg the relationship between Perry Bar and The Hub?

Commentary: BCC – there are some good links, eg open space strategy , which links residential areas to major areas of open space, such as Handsworth Park, but AAP could be strengthened in terms of links between the Hub and surrounding communities.

Inspector's comments: Any particular links in mind?

- 1.4 **Impact of the emerging Core Strategy:** In what ways will the AAP influence the emerging Core Strategy?

Commentary: BCC – AAP takes forward key policy aspirations of CS.

Inspector's comments: What about in the reverse direction?

- 1.5 In relation to the proposed **Regional Investment Site (policies R1-6):**
- (i) Is the estimated 3,000 new jobs justified in the current economic climate?
 - (ii) Does the site meet all the criteria in West Midlands RSS policy PA7B (ii)?
 - (iii) Is the long period since the inception of the Aston RIS (over 10 years) an argument for proposing something less ambitious, perhaps with more general industry and a lower jobs expectation?
 - (iv) Are the land acquisition and phasing assumptions in Table 1 realistic?
 - (v) Can it be demonstrated that the impact on the strategic road network will be acceptable? Is the Framework Travel Plan realistic and capable of effective monitoring?
 - (vi) What elements of a high quality public transport system are proposed, and how will these be delivered and funded? If bus penetration within the RIS is viewed as essential, should this be included within the AAP?
 - (vii) How will policy R1 define 'high quality' B2 uses, and how will it prevent possible changes of use within B2 to less appropriate uses?
 - (viii) How is 'small scale retail' defined?
 - (ix) What are the S 106/S278 highways and transport costs in policy R6? Are they all essential prior to development, or are some schemes desirable but not essential?
 - (x) Will the proposed *Development Framework* be an informal document, outside the LDF?
 - (xi) Does the requirement for an outline planning permission for the whole site limit or delay the ability of phased development of the RIS?

A **situation update** from the Council is required in relation to points (i) – (xi) above.

Commentary: BCC:

- (i) ODPM methodology from 2004 used to calculate estimated jobs.
- (ii) Re RIS criteria - below 25-50 ha criterion, but higher density possible in urban environment and it could be extended if successful; exciting urban design potential; served by multi-modal transport; well related to motorway network; located near areas of greatest need; accessible to education and training opportunities; serves Regeneration Zone and High Technology Corridor.
- (iii) Preparation formally began in 2007; strong reasons for supporting RIS in this location, with other general industrial sites nearby; need to diversify economic base of the area; recent demand for land at other strategically significant employment sites has increased, eg Jaguar/Land Rover at Wolverhampton, Aero Engine Controls at Birmingham Business Park.
- (iv) Majority of land in public sector ownership (HCA) – consultants about to be commissioned to prepare Phase 1 Development Strategy; Aston RIS presents a rare opportunity to provide a high quality business environment; Council will work with existing companies to secure an effective relocation, eg Mercian Business Services, Concentric Controls; 2015 timetable for Phase 1 considered realistic; market conditions expected to improve towards latter parts of plan period.
- (v) BCC has worked closely with the Highways Agency (HA) to assess impacts on M6 Junction 6; slight detrimental impact , but within overall context of

existing congestion at this location. Framework Travel Plan (FTP) sets out range of sustainable transport measures that can be used by employers to reduce dependency on the private car. Needs effective monitoring.

- (vi) Aston RIS site is currently well served by heavy rail and 'showcase' bus services on the Lichfield Road. Bus penetration is not needed, as there are 5 bus stops within 400m of the site.
- (vii) Any planning permission for the RIS will require the developer to prepare a Scheme of Management, to ensure effective control of uses in relation to aims of RIS. **Suggested change** – include reference to requirement for a Scheme of Management in policy R5 – in Schedule of Changes.
- (viii) **Suggested change** – up to 2,000 sm gross within Schedule of Changes.
- (ix) Policy R6 costs estimated at £7 million; the highway improvements to junctions of Lichfield Road/Aston Hall Road; Aston Hall Road/Electric Avenue; and to Salford Circus are essential prior to RIS development.
- (x) An informal development framework will be prepared with HCA to take Phase 1 forward.
- (xi) Outline planning permission is not required for the whole RIS, and it could act as a deterrent to bringing forward Phase 1 land by imposing unnecessary costs and delays – **suggested change** - deletion from para 3.16 – in Schedule of Changes.

Mercian Business Services Ltd (MBS): MBS is an important provider of local jobs, but affected by uncertainty of the proposed RIS. The Council made insufficient effort to contact MBS as owner of Concentric Works, which forms significant part of Phase 1. This site already provides commercial space for businesses of the sort most likely to provide employment opportunities for local people. RSI employment would not directly benefit local people and result in more derelict land. AAP has underestimated role of industrial units such as the Concentric Works site in providing employment opportunities for local people. **Suggested change** – deletion of Concentric Works site from RIS and safeguard it as a seedbed for new business growth outside RIS.

Inspector's comments: in response to BCC:

- (i) Is 2004 too far back in time to be robust? How does the 3,000 jobs estimate compare with the Longbridge RIS?
- (ii) Re RIS criteria – is it too early to indicate RIS expansion areas?
- (iii) Are Wolverhampton and Birmingham Business Park sites comparable to Aston RIS?
- (iv) Is there a critical level, below which the traffic impact of the RIS on the strategic route network would be unacceptable?
- (v) How will the FTM be monitored?
- (vi) Is there not an argument that bus accessibility should be maximised, especially as 400m from one part of the site may be 600m from another part?
- (vii) Scheme of Management would need to override the Use Classes Order, but if it can it seems an appropriate way forward.
- (viii) Seems an appropriate way forward.
- (ix) What is the cost of the 3 critical highway improvement schemes, and is there a risk that the Phase 1 implementation date could slip from 2015 as a result? [See matter 4 – Delivery and Implementation.]
- (x) Noted.
- (xi) Noted.

In response to MBS: How will the AAP assist small businesses of the type highlighted by MBS?

1.6 **Employment provision:** How can the AAP address worklessness (para 3.7)?

Commentary: BCC: Creating new employment opportunities for local people is a priority of the AAP.

1.7 What are the differences between Core Employment Areas and Industrial Regeneration Areas?

Commentary: **BCC:** Core Employment Areas – focus for economic regeneration; Industrial Regeneration Areas – mainly older industrial areas with potential for improvement.

- 1.8 **Retail provision – policy LC1:** The comparison retail figures for Perry Barr/Birchfield District Centre in policy LC1 differ from those in the Draft Core Strategy [12,500sm gross for both 2008-2021 and 2021-2026 in Core Strategy policy SP18, compared with 10,000sm gross for both 2008-2021 and 2021-2026 in AAP policy LC1]. Which figures should prevail and why?

Commentary: **BCC:** In the light of objections from Walsall MBC and Sandwell MBC, the quantum of retail floorspace has been reduced from 12,500 sm to 10,000sm for both 2008-2021 and 2021-2026, which is consistent with RSS policy PA11, and CS policy SP18.

Walsall MBC: Retail objection withdrawn, but **objection** to proposed office development maintained, as it is in excess of RSS 5,000 sm allocation outside network of strategic centres.

- 1.9 Is the retail provision likely to impact significantly on the retail viability of Walsall and West Bromwich centres?

Commentary: **BCC:** Walsall and West Bromwich centres have 220,000sm each, and 10,00sm at Perry Barr is not threatening to these neighbouring centres.

- 1.10 **Sports Provision:** Does the AAP address the role of sport in achieving regeneration and other planning objectives at an appropriate level?

Commentary: **BCC:** The AAP recognises the important role sport can play in the quality of life of residents in the area – part of meeting the SCS healthy city objective.

Inspector's comments: Are there any policies in the AAP that focus on sport, as opposed to open space in order to give the appropriate steer to the healthy city objective?

- 1.11 Is there a conflict between improvements to Villa Park and RIS parking requirements?

Commentary: **BCC:** AVFC currently meets its minimum parking requirements based on its Travel Plan and S 106 Agreement, and this is likely to continue even if RIS parking spaces are discounted from the agreed total of off-street parking spaces.

- 1.12 Is policy LC1 appropriately worded in relation to the future of Perry Bar stadium?

Commentary: **BCC:** Perry Barr Stadium site has potential for offering enhanced leisure facilities and a greater variety of uses for the local and wider community.

R&D Aggregates Ltd: Object to possible redevelopment of Perry Barr Stadium – **suggested change** – *policy LC1 to state that stadium will be retained for current uses of speedway racing and similar or associated uses.*

- 1.13 **Transport provision – policies T1 – T12:** Is the transport vision translated into sufficient detail in the relevant AAP policies for the plan to be effective? Does the AAP positively promote (a) reducing the growth in number and length of motorised journeys; (b) promoting economic regeneration; and (c) ensuring accessibility for all?

Commentary: **BCC:** AAP provides clear and sufficiently detailed multi-modal transport vision, which accords with the land uses proposed. AAP identifies the key infrastructure necessary to unlock and support economic regeneration.

- 1.14 In what ways can policy T1 improve east-west links across the area? Is it sufficiently clear on who is expected to fund and implement the public transport improvements?

Commentary: **BCC:** Several measures envisaged, including enhanced junction capacity; smarter choices; improved accessibility; reduction of A34 severance; and enhanced east-west public transport. Implementation through S106/S278 Agreements and extension of public transport routes through market forces.

- 1.15 The AAP outlines the problems associated with the Parry Bar/Birchfield District Centre and the railway station; should it contain proposals to address these issues?

Commentary: **BCC:** Policies T8, T9 and T10 address these problems.

- 1.16 In relation to para 6.7, what 'configuration' of the A34 is proposed, and should the AAP be more detailed and/or annotate the scheme on the Proposals Map?

Commentary: **BCC:** AAP sets strategic direction-more detailed work to follow through Regeneration Framework, with involvement of stakeholders.

- 1.17 Should the AAP make reference to the *Birmingham Vision for Movement* aspiration for a "well connected city", and in particular the A34 a rapid transport priority (in policy T7) and the A38 strategic bus route (no policy as such in AAP)?

Commentary: **BCC:** It is referenced in the Transport Strategy, whilst policy T7 covers the A34 rapid transit priority. A38 (M) strategic bus route is not especially relevant to accessing the plan area.

- 1.18 Is the AAP provision for cycling at an appropriate level?

Commentary: **BCC:** AAP provides an appropriate level for cycle provision, which is referred to in policies T1, T4, T6 and T7.

- 1.19 Are there any proposals for new development outside the plan area which could have traffic implications within the plan area, eg relocation of the wholesale market to Witton Square?

Commentary: **BCC:** There are no proposals for new development outside the plan area that could have traffic implications within the plan area. The Witton wholesale market proposal is no longer being progressed as an option.