

Birmingham Planning Policy Consultations:

- 1. Development Management Plan**
- 2. Parking Supplementary Planning Document**

**Representations on behalf of Unite the Union
and Knowledge Quarter partners**

Signing off Sheet

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Appendices

Appendix 1 – Masterplan area

1. Introduction

- 1.1 These representations are submitted by NJL Consulting on behalf of Unite the Union ('Unite') and their Birmingham Knowledge Quarter ('KQ') partners ('the KQ partners') in response to the emerging 'Development Management in Birmingham Plan' ('DMBP') and 'Birmingham Parking Supplementary Planning Document' ('eBPSPD'). A single representations document is submitted due to the key related themes between the comments on each emerging plan.
- 1.2 As key landowners and stakeholders, the KQ partners wish to engage constructively with the emerging plans, in the context of the ensuring future ability to deliver and maintain sustainable yet innovative forms of growth.
- 1.3 The Knowledge Quarter is a key opportunity area given; its regional importance, the city centre location, proximity to the HS2 Curzon Street station, potential public transport improvements, excellent accessibility, the quantum of land which is available and the site specific context which lends itself to bespoke development
- 1.4 There are ongoing development options within the wider masterplan area (included at **Appendix 1**), which is backed by both key local and regional stakeholders, including Unite, Bruntwood SciTech, Aston University and Birmingham City University. There is a clear opportunity for significant and innovative growth, but only if the planning policy position is favourable and creates conditions which encourage and promote growth.
- 1.5 In the context of these representations; given the suitability for a range of uses in the KQ, there must be appropriate levels of car parking to serve future occupiers. By seeking to prevent further parking in the city centre the emerging plans are potentially placing a significant constraint on growth. Indeed, car park design at the KQ could incorporate measures which respond to usage shifts as demand reduces with new transport alternatives and technologies.
- 1.6 Focussed policies, which enable replacement and rationalised car parking in highly accessible areas on the edge of the city centre, means that city centre sites can be released for development in full knowledge there is a wider strategy to ensure necessary infrastructure is in place.

Representations summary

1.7 The representations document is set out in the following sections:

- Section 2 highlights the context both nationally and locally regarding managing economic growth and sustainability;
- Section 3 sets out the existing and future ambitions at the KQ;
- Section 4 sets out the emerging policy position, including the Development Management in Birmingham Plan and the Birmingham Parking Plan;
- Section 5 has suggested revised policy working for the emerging Development Management in Birmingham Plan;
- Section 6 has suggested revised policy working and the emerging Birmingham Parking SPD; and
- Section 7 concludes summarising the opportunity that is presented to set a positive framework for managing car parking in the city centre.

2. Wider context – economic growth and sustainability

National picture

- 2.1 There is a growing impetus towards tackling climate change as a key global issue, and this is no more prevalent in city centres given air quality and private car emissions. This includes a clear push to reduce private car journeys as a source of pollution and remove cars from urban areas and city centres.
- 2.2 The introduction of low / no emissions vehicles, and the use of electric cars has become ever more prevalent with people realising they have to take part if pollution is to be reduced. The emergence of viable car sharing which give members access to a car on a short-term rental basis and charging by the hour or the day and car clubs which provides an opportunity to share lifts to reduce overall costs and pollution.
- 2.3 The climate 'crisis' has led to Government introducing the landmark Environmental Bill ('the Bill'), which will deliver significant changes in how environmental matters are reviewed, managed and mitigated. This is alongside commitments to have a net-zero carbon economy by 2050.
- 2.4 Existing efforts to address air quality issues include the Clean Air Zones ('CAZ') initiatives which are due to come in to force in 2020. The recently published 'Clean Air Zone Framework' (February 2020), sets out the principles for the operation of CAZ in England, bringing together local measures to deliver immediate action to improve air quality and health with support for cities to grow while delivering a sustained reduction in pollution and a transition to a low emission economy.
- 2.5 Sustainable development, including managing climate change is a key thread of national planning policy (in the National Planning Policy Framework ('NPPF') (2019)). Indeed, NPPF chapter 9 highlights the importance of planning in facilitating sustainable development whilst contributing to wider social and health objectives. The NPPF goes on to advocate maximum parking standards, albeit that this should be balanced with a need to ensure centres are accessible and provide convenient, safe and secure parking, alongside measures to promote accessibility for pedestrians and cyclists.

Local picture

- 2.6 In 2019 Birmingham City Council ('BCC') declared a climate emergency, in doing so making a commitment to reduce the city's carbon emissions and limit climate change.

The council's ambition is to become a net zero carbon city by 2030, or as soon as possible thereafter as a 'just transition' allows. This is set out in the city's 'route to zero' (R20). Alongside this, the Council Plan (i.e. the strategic vision for BCC) was updated to ensure BCC take the lead in tackling climate change.

Clean Air Zone

- 2.7 The council has also confirmed plans for a Birmingham Clean Air Strategy ('CAS') (including CAZ) which sets out a series of high-level goals for how the city can support the journey towards cleaner air. The CAZ forms part of these CAS plans and covers all roads within the A4540 Middleway Ring Road once it comes in to force later in 2020. The CAZ will only charge the most polluting vehicles from entering the city centre area (i.e. the area within the Middleway). It is notable that the KQ is within the Middleway and thus inside the CAZ.
- 2.8 Clearly, the CAS and CAZ does not strictly prevent vehicles from entering the city centre but does seek to disincentivise the most polluting journeys. This is particularly prevalent in Birmingham whereby in addition to the Middleway and A38 (Aston Expressway) there are major routes which run around and through the city centre area, and thus leads to significant numbers of vehicles entering the city centre core itself.
- 2.9 Linked to this aim to reduce vehicle movements, the Birmingham Transport Plan seeks to create a step change in how people and businesses access the city centre.

Birmingham Transport Plan.

- 2.10 The emerging Birmingham Transport Plan ('eBTP') 2031 links with the above, setting out key objectives to meet future demand whilst balancing other responsibilities. It also sets out the local and regional transport strategy, and highlights a clear need for investment in sustainable transport and public transport.
- 2.11 A key part of the eBTP is a 'segment' approach to reducing car journeys and routes through the city centre by reducing vehicle access, discouraging journeys into the city centre whilst transforming the network of pedestrian streets and public spaces and investing in integrated public transport and cycling which links into the network of pedestrian friendly spaces.
- 2.12 The eBTP acknowledges that a strategic approach to transportation matters is essential if the proposed strategy is to be effective. This means, for example, measures to reduce city centre vehicle access must come forward alongside public transport and sustainable transport infrastructure so there is a genuine alternative.

3. Knowledge Quarter / SciTech

Existing context

- 3.1 The Knowledge Quarter is (formerly 'Birmingham Science Park Aston' and the 'Innovation District') is a key emerging area of the city centre which accommodates a range of small, medium and large enterprises, along with universities, colleges, offices and an emerging major hotel and conference centre (latter being delivered by Unite).
- 3.2 Its position within the eastern boundary of the city centre, and in broad terms is formed of an estate which is bound by the A38 (to the north), Middleway (to the east), Jennens Road (to the south) and Aston University (to the west). In a wider context, the city centre core is to the east, with Birmingham City University and the HS2 Curzon area to the south, and areas to the north and west separated by the A38 and the Middleway.
- 3.3 There are a range of existing uses within the KQ including the Innovation Birmingham Campus ('IB'), Unite's emerging conference centre and hotel, Birmingham City Council offices, Aston University, Birmingham Community Healthcare NHS, Aston University Engineering Academy, and National College for Advanced Transport & Infrastructure.
- 3.4 The KQ is a key emerging city centre opportunity. For example, Bruntwood SciTech's 'Innovation Birmingham Campus' is at the heart of the KQ and is the UK's largest dedicated digital technology business campus with over 170 digital tech companies. It provides coworking space, offices and meeting and conference facilities for digital tech entrepreneurs, start-ups, scale ups and large organisations. This is part of a wider community of over 1,000 innovators and investors looking to develop or fund digital tech businesses with high growth potential across sectors such as health, transport, finance, sport and property.
- 3.5 The significant growth over recent years is shown through the development of the Innovation Birmingham Campus (Phase 1) which is creating approximately 240,000sqft of innovation space and 600 jobs, with a Gross Value Added ('GVA') of £35.7m annually (once fully completed). Faraday Wharf, the Universities Centre and iCentrum have already completed, with further investment in the pipeline.

Usage, access, sustainability and public realm

- 3.6 The Knowledge Quarter is a sustainable location but has the potential for step change improvement in accessibility. This is in terms of both access to, but also within, the site.

It is ideally positioned on the edge of the city centre with direct access to Jennens Road, Middleway and A38.

- 3.7 However, whilst the area is undergoing initial change and investment is starting to filter through, there are still significant changes need to the fabric of the area in order to create a sense of place and identity. This investment, by the KQ partners, can deliver lasting and significant benefits to the area.
- 3.8 For example, the area lacks evening and night-time uses and is largely unused outside of weekday office hours. This unattractiveness outside of office hours is reinforced by the generally vehicle dominated environment with significant amounts of on-street, dedicated surface, undercroft and temporary parking which reduce pedestrian access and permeability. Of note, we estimate the KQ has in excess of 1,000 existing car parking spaces spread across the area in a generally ad-hoc manner with no strategic approach to providing parking.
- 3.9 Furthermore, the KQ generally turns its back on the Digbeth Branch Canal which cuts through the site meaning that the canal environments are un-welcoming, and a development opportunity continues to be missed.
- 3.10 Therefore, there is a growth opportunity in the area of which transport / parking must be part of the solution as it can unlock significant development opportunities, not least the release of existing car parking for development.

Future development ambitions

- 3.11 There are significant future ambitions at the Knowledge Quarter / SciTech with circa 1.3msqft of development potential over the lifetime of the proposals, showing significant capacity given future population growth. This approach to growth is identified in an emerging KQ masterplan which has the backing of the KQ partners. The Unite conference centre and hotel also sit within the wider KQ area and will be critical in delivering supporting uses which enable the KQ benefits to be fully realised.
- 3.12 Bruntwood SciTech for example are progressing initial phases of building to deliver innovation space. An example of this being the 11-storey building at the northern edge of the KQ, which will create a further 150,000sqft of high quality office space to align with the Bruntwood SciTech vision for the KQ.
- 3.13 The wider masterplan shows further phases of development to create a vibrant and productive quarter of national and international importance. This would include

significant additional space available to the digital and innovation industry, which links to wider smart city technology advances and maximises the potential benefits of HS2. However, this will require coordinated spatial, economic and infrastructure planning by the KQ partners (the process of which is moving forward).

- 3.14 This all sits within wider KQ ambitions to create accessible and quality public spaces within a modern masterplanned development; which introduces new uses, redevelops underused space, reduced vehicle access, improves realm and permeability, creates evening and night-time uses and brings activity to the KQ and canal frontage. These ambitions are all clearly aligned within an overarching emerging masterplan.
- 3.15 In accessibility terms, the additional office and associated space proposed within the KQ masterplans and visions would create significant number of jobs and thus require a certain level of accessible parking within the area. We estimate that developments totalling 1.3m sqft could require in the order of 3,000 parking spaces using adopted and accepted highways trip methodologies. Clearly, this overall amount of parking would be reduced and managed over time with planned infrastructure improvements.
- 3.16 In this context, we note wider eBTP visions for Jennens Road as a public transport hub with reduced car access and significantly improved public realm. Furthermore, access from the Middleway can reduce the need for vehicles travelling through the masterplan area. In turn, this frees existing vehicle dominated spaces for development and other beneficial uses.

Summary

- 3.17 Significant development is planned for the KQ area over an extended period which will deliver the step change in available development space, public realm, accessibility and throughout the day usage of the area.
- 3.18 Car parking and access are essential components of development in areas such as this, and if consolidated, can act as a catalyst by freeing up other development land.

4. Overall comments on the emerging policy position

- 4.1 This section identifies the emerging policy position within the;
- i. Development Management in Birmingham (2019) (Publication Version), and
 - ii. Birmingham Parking Supplementary Planning Document (2019).
- 4.2 We provide overarching comments relevant to the two plans in this section, before Sections 5 and 6 provide suggested policy changes to emerging documents.

Aligned infrastructure

- 4.3 In the first instance, Unite and other KQ partners accept and acknowledge the need for a step change in how vehicles access the city centre. Within that, the KQ partners have ambitions to deliver sustainable growth which fits the low carbon and energy efficiency agenda over the masterplan period. This commitment to low carbon and efficient growth is significant and noteworthy. However, if growth is to be delivered then certain infrastructure will need to be in place before genuine changes can be realised.
- 4.4 For example, simply preventing new car parking in the city centre area has the potential to significantly inhibit growth and present an unforeseen constraint on new investment. Indeed, irrespective of sustainable transport ambitions it is inevitable that for the foreseeable future there will be a requirement for private car and vehicle access to the city centre and associated developments.
- 4.5 Although the city centre area would be within the CAZ, there are opportunities for parking within (but on the edge of) the city centre (i.e. the KQ) which can avoid vehicles entering the CAZ as access would be directly from the Middleway.
- 4.6 Any restriction on parking provisions must be brought forward alongside a step change in public and sustainable transport infrastructure which provides a genuine alternative to the private car. Without the necessary infrastructure being in place the parking concerns will simply be displaced to other areas of the city centre which moves, rather than solves, a parking problem.
- 4.7 The KQ partners are concerned with the approach to zero parking for new commercial development within the city centre and the major restriction of maximum parking standards for other land-uses. The 'big ticket' aspirations within the Parking SPD and separate Transport Plan could take 20 years to deliver and mature, meaning there would be an immediate displacement of parking with no genuine alternative access.

Masterplanning and strategic options

- 4.8 More creative transport options are available which could be picked up in the Transport Plan. For example, an improved circular bus route around the city centre with hubs around the edge of the city centre and a shuttle bus service into around the city centre core could encourage sustainable journeys within the city centre. The KQ could form one of such hubs and the hub location could tie in with KQ Masterplan development and parking ambitions.
- 4.9 The KQ partners consider that BCC's policy approach should therefore be to encourage replacement and rationalised parking in accessible edge of centre locations, particularly where it forms part of a wider development strategy and can release existing land (particularly car parking) for more beneficial development. Such an approach would not necessarily clash with CAZ ambitions.
- 4.10 The KQ is one such area where a co-ordinated and plan led approach to parking provision is suitable, and indeed could lead to earlier development gains with reduced levels of parking overall. As we have identified in Section 2, there are significant potential benefits from developing underutilised land in the KQ. But this development can only occur if the conditions (i.e. the market and planning policy) are favourable.
- 4.11 As such, a suitable worded policy approach could create a 'release valve' for parking provision whereby relocating existing parking to a masterplanned strategic location (such as the KQ) means existing car parking can be redeveloped.

Technical considerations

- 4.12 On a technical basis, the KQ partners are firmly of the view that emerging parking policy must consider low/zero vehicles infrastructure and the ability to easily deliver fit for purpose infrastructure. Indeed, car park design at the KQ could incorporate measures which respond to usage shifts as demand reduces with new transport alternatives and technologies.
- 4.13 Overly restrictive policies will significantly inhibit the ability to invest in modern parking which includes features such as vehicle charging. For example, it is technically challenging and generally both unfeasible and unviable to retrofit existing major car parks with electric vehicle charging due to the:
1. Extensive works needed to a car park to provide infrastructure and charging;

2. Insufficient space within the existing structure to accommodate significant additional cabling and power requirements;
 3. Need to provide additional power to the car park to enable charging points, when additional power may not be available for that location; and
 4. Fact that charging points take up space within parking bays and existing car parks were not designed to allow for this extra space, meaning there is insufficient space to accommodate multiple charging points
- 4.14 A restriction on new car parking will restrict the opportunities and capability to support low emissions vehicle parking and charging in the city centre. This would be entirely at odds with wider BCC ambitions to reduce emissions and encourage low emission travel.
- 4.15 As such, it is entirely logical to allow new parking in suitable and accessible locations where it can also provide dedicated low emission vehicle spaces and other associated infrastructure. This is particularly beneficial where it can reduce ad-hoc parking.
- 4.16 The KQ is one such area where such a car park, which would be close to other sustainable transport routes, could be provided.

5. Suggested revised policy: Development Management Plan

- 5.1 The KQ partners suggest the following focussed amendments to the Draft 'Development Management in Birmingham' Plan. Alongside the suggested changes, it is unclear if the policy is an 'and' or 'or' criteria based policy, and this should be addressed in revised wording.
- 5.2 The suggested revisions remain in the context that changes to parking policy must be brought forward alongside significant public transport improvements. The KQ partners consider there to be a logical justification for new standalone parking in regeneration areas where such proposals can assist in delivering regeneration.

Policy DM15: Parking and servicing

Part A: Parking and servicing

1. *Parking and servicing should contribute to the delivery of an efficient, comprehensive and sustainable transport system. Development should promote sustainable travel, reduce congestion, and make efficient use of land.*
2. *New development will be required to ensure that the operational needs of the development are met and parking provision, including parking for people with disabilities, cycle parking and infrastructure to support the use of low emission vehicles and car clubs is in accordance with the Council's Parking Supplementary Planning Document.*
3. *Proposals for parking and servicing shall avoid highway safety problems and protect the local amenity and character of the area. Parking should be designed to be secure and fully accessible to all users and adhere to the principles of relevant Supplementary Planning Documents.*

Part B: New standalone parking provision

4. *New standalone car parking will be supported in defined regeneration areas, or areas subject to wider masterplans. For example, where: there is a parking need; the provision of a standalone car park can be shown to have demonstrable benefits; and/or new parking can release existing car park sites for development.*
5. *Proposals for standalone parking facilities outside of these regeneration areas must clearly demonstrate that there is a deficit in local publicly available off-street parking, or that it will help to relieve on-street parking problems.*

6. Suggested revised policy: Parking SPD

Policy background

- 6.1 The eBPSPD sets out redefined 'zones' to reflect a more nuanced set of characteristics impacting on the approach and level of standards to be applied. Figure 3 identifies three zones, the Knowledge Quarter / SciTech is within 'Zone A'. Table 2 then sets out each zone's characteristics, and parking provision characteristics in relation to each zone. In the context of 'Zone A' it states

Table 2: Parking Standards Zone Characteristics

Zone	Zone Characteristics	Parking Provision Characteristics
A	<ul style="list-style-type: none">• Very high or high public transport accessibility• All locations within the Clean Air Zone• High population density• Well served by cycle and walking facilities• Primarily retail and commercial with high density residential• Comprehensive on-street parking restrictions.	<ul style="list-style-type: none">• Car free development• High provision for cycling, Car Clubs, ULEV (and bike hire where appropriate).• Adequate servicing and operational provision.

- 6.2 Therefore, the eBPSPD promoted 'zero parking' in Zone A (other than disabled user car parking only) for commercial use classes. KQ partners are concerned with this strategy.

Suggested changes

- 6.3 Considering the matters identified in Sections 2 to 4 of these representations, the KQ partners suggest the following focussed amendments to the Draft 'Birmingham Parking SPD', in order to create suitable and workable policies. The suggested revisions remain in the context that any changes to parking policy must be brought forward alongside significant public transport improvements.
- 6.4 Rather than making significant changes to the policy, which seeks to reduce city centre parking provision, a further or site/area specific policy should be added to enable new car parks in regeneration zones where the new parking has other 'spin off' benefits.
- 6.5 As such we suggest the following additional policy to enable the delivery of growth and regeneration in the Knowledge Quarter.

Policy MA1 (Masterplan Area 1): Knowledge Quarter

New standalone car parking will be supported where it can be proven it will assist overall regeneration and delivery of development in the area.

This new standalone car parking will be expected to address the following where feasible and appropriate, i.e. that it:

- Demonstrates strategic approach to car parking in the area;
- Enables net reduction, or managed change, in parking over the area;
- Enables the removal of on-street and/or surface parking;
- Enables fewer private car journeys – e.g. dedicated car sharing spaces;
- Is linked to real time parking information;
- Includes low emissions charging;
- Incorporates active frontage where appropriate and beneficial;
- Achieves a high quality design;
- Achieves BREEAM / sustainability credentials; and
- Supports the managed parking / travel demand in an area.

7. Summary

- 7.1 These representations, on behalf of Unite the Union and Knowledge Quarter partners, are submitted to the emerging 'Development Management in Birmingham Plan' ('DMBP') and 'Birmingham Parking Supplementary Planning Document' ('eBPSPD'). A single representations document is submitted due to the key related themes between the comments on each emerging plan.
- 7.2 The submission broadly supports the emerging plan visions, given the need to respond to climate change whilst delivering regeneration and growth. Indeed, the KQ partners behind this submission are pushing the low carbon and sustainability agenda's through the Knowledge Quarter Masterplanning and wider business objectives.
- 7.3 However, KQ partners are concerned the emerging policy approach, and particularly the 'zero parking' position in the eBPSPD, will only serve to displace current parking problems whilst at the same time creating an obstacle to delivering regeneration.
- 7.4 It is critical that policies to reduce the level of car parking within the city centre (as part of a wider strategy to limit vehicle access to the city centre) are brought forward alongside significant investment in public transport to ensure there are genuine travel alternatives to the private car.
- 7.5 Furthermore, the emerging policies have an unintended consequence of potentially stifling innovation in the parking sector as an inability to deliver new modern car parks will mean existing car parks (which often lack low emissions / vehicle charging) will continue to be relied upon.
- 7.6 Rather, a more robust and sustainable approach would be to encourage new state of the art standalone car parks in accessible locations on the edge of the city centre (and thus the edge of the CAZ), where such locations are also key regeneration areas with potentially excellent sustainable links to the city centre.
- 7.7 The Knowledge Quarter is one such location. A masterplanned and strategic approach to car parking in the KQ will release existing car park sites for future development in full knowledge that essential car parking can be accommodated elsewhere within the site, which reduces overall parking numbers in the area. Therefore, a strategic approach to parking in this area could be a much needed 'release valve' which enables future regeneration.
- 7.8 We trust these representations can be considered accordingly.

Appendix 1



Knowledge Quarter indicative boundary

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