



BIRMINGHAM PLAN 2031

Statement by West Midlands CPRE

Matter B: Employment land and retail provision (BDP policies PG1 & TP16)

Main issue: Does the Plan make adequate and appropriate provision to meet employment and retail development needs?

1. West Midlands CPRE will be appearing in relation to Matter J. Our colleagues from Warwickshire CPRE will be commenting on Peddimore specifically. These written responses relate only to questions 2-4 which relate to our objections on housing and employment land.

Questions:

2) Are the overall requirements of policy PG1 for employment land and office floorspace soundly based on evidence, and appropriate to meet the needs that are likely to arise over the Plan period?

2. Policy PG1 'Overall levels of growth' shows employment land requirements as:

- 2 Regional Investment Sites of 20 and 25 ha and an 80 ha employment site at Peddimore.
- A minimum 5 year reservoir of 96 ha of land for employment use.

followed by retail and office floorspace requirements.

3. Policy TP16 is titled 'Portfolio of employment land and premises'. The minimum reservoir requirement for 'Best Quality' sites is given as 60 ha. This provision can be in a number of locations.

4. Para 7.6-7.7 of the Plan state:

7.6 Much of the City's employment land supply lies within the Core Employment Areas identified in Policy TP18. Future supply will be supplemented by additional recycling opportunities which can be expected to emerge through the plan period.

7.7 However, monitoring of the employment land pipeline, undertaken through the Employment Land Review indicates a significant shortage of Best Quality employment land. To address this shortfall and ensure that there is a sufficient supply of sites, 80 ha of land has been identified on the site at Peddimore for Best Quality employment development (Policy GA6).'

5. The original location for 'Best Quality' development, Washwood Heath, could provide 53 ha. It was supported in the finding of the City Council's 2012 Employment Land Review (EMP2, para 5.4, page 23) which says:

'the Washwood Heath sites are considered by the market as one of the best quality industrial opportunities in the City due to their ability to accommodate large footprints, with good access to the strategic highway and rail network and owners willing to work together to bring them forward for redevelopment in a comprehensive manner.'

6. The HS2 Bill before Parliament currently seeks to utilities the Washwood Heath location for the HS2 train maintenance depot. If that proposal were dropped the Washwood Heath location could be allocated as the main 'Best Quality' employment site in the City - as it was in the December 2010 consultation draft Core Strategy.

7. Policy TP17 covers Regional Investment Sites (RIS). The two locations, Longbridge and East Aston, are established and development within the land so designated is going ahead.

8. The RIS categorisation is carried over from the past policies of the former Regional Spatial Strategy and of Regional Planning Guidance before that. RISs were intended for major users (sometimes single users) but in practice a variety of firms of different sizes have taken sites within them. In terms of the types of firm that take up space, the key difference between the RIS category and the 'Best quality' location is that Birmingham allows 'Best quality' sites to include B8 warehousing (see Policy GA6).

9. The categorisation of Peddimore proposal as 'Best Quality' allows it to have B8 warehousing use with only 40 ha is to be reserved for B1c and B2 Industrial uses, while any office development must be ancillary to the main industrial use. Given the buoyant market for large logistics depots in the West and East Midlands serving a national market, this is likely to reduce its role in providing land for industry to support the diversification of Birmingham's economy.

10. It also means that the Council has not taken account of the impact of other large sites currently being considered, such as Coventry Gateway, which would in reality serve the same market.

11. This concerns us because Peddimore is being removed from the green belt so 'very special circumstances' need to be applied, and we believe the council should have to demonstrate that the provision for such a large sites, effectively serving a regional market, could only be justified if there was no available capacity in neighbouring authorities.

12. Should Peddimore be retained in the Plan, despite our objection and that of Warwickshire CPRE, we believe it should be held back at Safeguarded Land for the later part of the plan. We also believe the level of B8 use should be reduced and it should be subject to an Area Action Plan as at Longbridge.

3) If housing provision is made outside the Plan area to meet Birmingham's needs, is there a need for employment land also to be allocated outside the Plan area to complement that housing provision?

13. As we set out in response to Matter A we do not believe there may be any need for additional housing provision outside Birmingham, with the exception of brown field land in the Black Country.

14. However, if such provision is made the requirement for employment would need to be considered. Para 018 of the NPPG section on Assessing Housing Need is clear that: 'Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems.'

15. In some cases this may mean additional employment land in the areas involved, but in other well established commuting towns with existing public transport links, employment growth may be limited and investing in public transport improvements a better option.

4) Does the categorisation of employment land into Regional Investment Sites and three other quality categories appropriately reflect future business needs?

16. As set out above at Para 8 of this statement, the current categorisation of employment land as RIS in respect of the two locations in the Plan, Longbridge and East Aston, is supported and derives from the historical basis for their designation in the period of the Regional Spatial Strategy - the RSS not being revoked until Spring 2013.

17. The Plan's acceptance of B8 warehousing at 'Best Quality' locations undermines the meaning and purpose of that category of employment land and the definition of 'Best Quality' might be changed to tighten up on what is permitted at those locations.