

**Matter E: Green belt (TP10)**

**Question 1**

I believe that Policy TP10 sets out a reasonable approach to the aims and functions of the Green Belt as a way of protecting valuable countryside from being built on. The fact that the Council is proposing a very large take of the remaining Green Belt, on assumption of approval, suggests it is not giving the Policy sufficient respect.

I believe the developers want to take an even larger amount of the Green Belt around Sutton Coldfield as an alternative to providing housing in Nechells and Ladywood. This directly contravenes the principle of maintaining the Green Belt to ensure the recycling of urban land.

Paragraph 6.57 of the BDP states: "The remaining Green Belt within the City will be protected for the long term...". I assume this is along the lines of what was said the last time the Green Belt was changed, in the same way that the document refers to establishing 'defensible boundaries' while violating the previous ones.

These proposals show that, if anything, TP10 requires strengthening.

To recap, the BDP violates policy in the following ways:

Policy: "to check the unrestricted sprawl of large built up areas"

Proposal: Building on 'Area C' extends urban sprawl because it is adjacent to existing built areas; the proposal for 'Area D' extends this even further.

Policy: "to assist in safeguarding the countryside from encroachment"

Proposal: To encroach on the countryside in a massive way.

Policy: "to preserve the setting and special character of historic towns"

Proposal: Parts of the area are historic, and generally the locations have developed their own character. This is under serious threat by the very scale and speed of the housing scheme being recommended.

**Question 2**

The proposal for 6,000 dwellings on Green Belt makes a small contribution to the declared need for housing, but has a disproportionately large impact on the amount of Green Belt available within Birmingham. The availability of housing, as proposed for this area, would lead to acceleration of population growth, therefore the current problem would have to be re-visited in years to come – except with larger population numbers and less land available. It is therefore vital to review land uses and housing types, rather than simply to take yet more Green Belt and kick the difficulty into the future.

If the numbers of dwellings required is higher than stated in the Plan, a more radical solution such as a New Town could be required. I understand the most significant housing demand is south-east of Birmingham, so this development may not be in the

optimum location anyway; travel from Sutton Coldfield to the south-east involves busy and congested roads, so should be avoided if at all possible.

The GBSLEP presentation (Exam 2F) is rather technical, and is obviously intended for use with a commentary, but seems to suggest that there is a large range of possibilities of future housing demand – in which case there is insufficient data on which to make a decision.

What can be said with certainty is that Green Belt land, and other natural resources, are finite. It is simply not sustainable to continue to take Green Belt in the manner proposed.

This question needs to be addressed on strategic basis, involving a much larger area than just Birmingham, because of the numbers at the higher end of the predictions range and the ultimate need to consider a longer timescale. Against those totals, 6,000 is a tiny number, and would provide just a stopgap; destruction of the City's Green Belt would be permanent. On the sixth page of the document "BCC Response to Comments on Langley (GA5)...", the Council admits that it would rather lose part of its Green Belt than look for a solution beyond its boundaries, which comes across as a stubborn and short-term approach.

The Green Belt is provided for the benefit of the citizens of the City. Taking a large chunk of it away would solve nothing, it would simply make Birmingham a worse place to be until a longer-term, wider-scale solution was implemented.

### Question 3

My understanding is that the subject of employment land remains related to the need, or otherwise, to provide land for a HS2 depot in the Washwood Heath area. The BDP assumes that HS2 is built and therefore the City has to provide additional land to make up for the loss of the Washwood Heath site. That being the case, there should be an examination of whether:

- an alternative site could be found for the HS2 depot, if the new line is approved;
- an alternative site could be found for the employment facility, possibly nearby but closer to motorways, to avoid extra HGV traffic in places such as Minworth and Curdworth;
- Network Rail could release redundant land

before it could be seen if exceptional circumstances exist.

I would expect a site that could be linked to the railway network would have been chosen, but this is not the case.

### Question 4 (Area 'C')

Reference is made to "Area C" and "Langley SUE" in the text of Question 4. Whilst "Area C" is qualified by use of the speech marks to reflect its status as merely a proposal, I am concerned at the Inspector's use of "SUE" without any such qualification. The "Sustainable" label has been added by the scheme's promoters to create an impression of a high level of environmental performance. I believe it is for

the Inspector to test and validate any such claim, rather than repeat it, and that "SUE", or any other terminology intended to create a positive impression, be suitably qualified where it appears in the Examination process.

I consider the proposal for 'Area C' is not sustainable for the following reasons:

- large take of Green Belt land, thus permanently damaging the environment and amenity
- very high dependence on private car for travel
- poor connectivity and long journeys by bus
- reductions in bus services for some areas
- questionable viability of bus services identified by recent report
- no light rail provision
- no prospect of an attractive heavy rail service

The original selection of 'Area C' for this process had anomalies:

- The BDP suggest the development in 'Area C' would be self-contained, yet is predominantly intended for housing and features no significant employment.
- The suggestion of self-containment is further damaged by the fact that the proposed development site is alongside a built-up area – thus creating demand for travel from new housing to existing facilities. Separating the proposed development from existing suburbs would create disincentives to travel and should help to foster a sense of community.
- The stated aim is to minimise car use and encourage public transport, yet one of the primary reasons given for the selection of 'Area C' was its proximity to a main road to Birmingham.
- Given the point above, that the surrounding areas all have very high levels of car ownership. The BMAP report says that increasing distance of travel generates more car use, so car use in 'Area C' would be expected to be higher than in its neighbours.

I believe the assumptions within the "SUE" concept, as applied here, should be challenged as part of the Examination process. Particular points being:

- the idea that members of families will move to an area and then live, work, go to school, shop and pursue leisure activities all within a short distance. Nowadays, people travel, sometimes considerable distances, for these activities and members of families have different destinations;
- the suggestion that 'sustainable' methods of travel will have a significant role to play, rather than the predominance of the private car.

I understand that the "SUE" concept is the current fashion in the Planning community, so there must be many examples where the claims of the promoters can be measured against actual behaviour by residents once schemes have been built and established.

#### Question 4 (Transport)

As to the practicalities of the proposals for the Sutton Coldfield area, traffic congestion is often the first thing people think of if they find out about the BDP, so it is vital that this issue is dealt with satisfactorily. Currently, there are insufficient

proposals in place, and no guarantee that any of them would come to fruition if the Plan were to be approved.

The proposal hinges on the provision of a 'Sprint' bus service. Regarding 'Sprint':

- This type of operation is not proven in the deregulated UK bus market
- In the West Midlands, despite several years of discussion, Centro have only progressed as far as consultation over proposals for the first trial route
- Even if the first trial is successful, which would have to be proven over a period of time, roll-out of the 'Sprint' concept will be slow, and I have seen no date for a route to Sutton Coldfield via Walmley.
- There is as yet no detail as to how the 'Sprint' would avoid getting stuck in the numerous traffic jams which exist along its proposed route.
- The "Birmingham Eastern Fringe Bus Study", section 3.2.1, calls for rigid single-deck buses to be used, so it is hard to see this offering as transformational. Low-floor single-deck buses have limited seating capacity because of the requirements on them (e.g. provision for wheelchair, buggies, luggage, standing room, plus the constraints of the vehicle structure), so most seating is, unfortunately, near the back. The specification requires increased seat pitch, thus losing more seats, while the 'Sprint' idea – according to Centro – involves 'multi-door boarding', which could only be achieved by sacrificing further seating capacity. It is difficult to see how such an arrangement – for relatively long bus journeys – would attract people from cars or appeal to those used to the space available on the current double-deckers.
- From the loadings on the 914, I would expect a single-deck 'Sprint' to struggle for capacity in the peaks and at school travel times, but for the frequency (allied to other services) to be over-generous at quieter times of day. Many higher-capacity routes in the Birmingham area which were changed to single-deck operation (e.g. 9, 14, 22, 23, 24, 35, 60, 74, 75, 94, 97) have reverted to doubles because of the ability to provide capacity at busy times or during disruption.
- Road layout and traffic conditions to the west of Walmley Road / Hollyfield Road mean that the 'Sprint' concept would not achieve any benefit over a conventional bus in this area.

Consequently, I am not convinced of the transformational effects of this type of operation that its supporters claim.

I pointed out in the Consultation that 'Area C' and Walmley cannot both be adequately served by buses because they lie alongside each other. This is borne out by the 'Birmingham Eastern Fringe Bus Study', which has been published since then. Note that the proposals shown involve removing existing bus services from some sections of route and lengthening other routes in order to extend their reach. There are also places where the number of routes operating is cut, lessening the number of available destinations and the frequency of service.

According to this study (sections 6.3.2, 6.3.3 and J), all the proposed bus services would lose money for several years, with only the 'Sprint' achieving break-even within a foreseeable timescale; I exclude the 108 as that only operates a few peak-hour trips on weekdays. In the current economic climate, loss-making bus services have to be regarded as being at risk. I would, therefore, seriously question whether the



routes and frequencies proposed can be provided, and sustained, in order to support the claims of the proponents of the development. My suspicion is that, due to the location of 'Area C', the existing patterns of car ownership, the types of housing the developers will want to build and the way people live, the vast bulk of the trips to and from any housing around Langley would be by private car. It should be remembered that the last few months have seen the withdrawal of both the 71A and 119 bus routes, which have only been partially counteracted by one extra 71 per hour (when not cancelled or cut short due to traffic elsewhere en route), suggesting that the viability of buses in the area is in general decline.

The BMAP study forecast an additional 22,000 car journeys to and from the 'Area C' development. Given the following:

- 6,000 dwellings;
- Local car ownership in excess of 1.5;
- Limited availability of destinations available via public transport;
- Significant distances to many locations;
- Occupation aimed at families, so multiple users and destinations, high degree of 'economic activity';
- No light rail or heavy rail provision in the area

this figure would appear rather conservative. My expectations are:

- Increased road congestion at all current locations
- Congestion spreading through a greater area through 'knock-on' effects
- Extension of peak congestion periods, as people change journey times
- Rat-runs through Walmley, Castle Vale and other districts becoming unavoidable

The Council's stated aim of reducing its carbon footprint (TP1) cannot be achieved unless the additional car mileage is counteracted by reductions in emissions due to congestion – which would require massive investment in road schemes.

The "Birmingham Eastern Fringe Rail Study", goes over the same old ground as previous such reports. There remains no definite plan to open the Sutton Park Line to passengers, and even if there was:

- the station at Walmley is unsuitable for Park-and-Ride for car users: there is no space for a car park, and it is located at a busy road junction;
- the proposed station at Minworth is also badly-located for car Park-and-Ride: the car park needs to be further out from Birmingham to prevent traffic reaching Minworth;
- hourly or half-hourly services are of limited benefit. 'Metro' frequencies are what is required, as experience in London shows;
- there is no diesel rolling stock available, and informed opinion is that no more will ever be built for the UK;
- as with other proposals, no funding source has been identified.

In the absence of a light rail proposal, the only rail asset that can make a difference is the Cross-City line. The locations that have been selected for the proposed developments are such that this line would not be able to make any useful contribution to the transport needs of residents and employees, nor to the Council's policy of reducing pollution and carbon emissions.

Summary:

Most of the proposed bus services supporting this proposal are shown to be uneconomic. There is thus a serious threat to the transport policies underpinning the Plan.

- 'Metro' frequency (10 minutes or better) rail services are required to support this type of development; however a heavy rail solution is not available and light rail has not even been proposed.
- Much of the transport infrastructure which will be necessary to support the proposed development has not been designed yet. The Plan cannot be sound until this is satisfactorily done, and funding ensured.

#### Other infrastructure:

At the time of the Consultation, plans for provision of the other infrastructure requirements were insufficient.

Healthcare, particularly hospital provision, was a major concern to residents – and remains so. The ability of the Good Hope Hospital to care for the current population has been a constant feature in the local press throughout this year. At the Public Meeting in Walmley on 03/12/13, the Planners in attendance were unable to answer on this matter.

Part of 'Area C' is known to be a flood risk; this had not been investigated at the time of the Consultation. Differences of opinion exist as to how serious a problem this could be.

#### Question 6

I am not aware of the proposed use of the 'Area D' site at Peddimore, and what basis the Council would propose or reject an application to use it. The Planners hinted that it would be earmarked for a major 'advanced manufacturing' development, and Jaguar Land Rover (JLR) are often mentioned as an example of the kind of employer that would occupy the site.

Companies such as JLR investing in major manufacturing expansions are few and far between, however. Many industrial sites in the vicinity are taken by road-based warehousing and distribution companies, given the proximity to the M42 and the wider motorway network. There would be concern about increases in that kind of activity, since they offer little in the way of employment but create a lot of nuisance in respect of noise, pollution and congestion – as well as the safety problems associated with heavy goods vehicle movements.

Should the preferred type of occupant does not materialise, I do not know whether the land would be kept as it is, or if it could be handed to a less-desirable operation, as

- There is not enough information about the use of this site available in order to comment on it.
- The BDP Consultation cannot have been assumed to have included the 'Area D' proposal for the above reason.
- Housing construction at 'Area C' (or elsewhere) would have to be tied in with any development at the Peddimore site, because of the assumptions regarding travel for work between the two locations.