

BIRMINGHAM DEVELOPMENT PLAN EXAMINATION

**MATTER G: SPATIAL DELIVERY OF GROWTH (BDP
POLICIES GA1-GA4 & GA7-GA10)**

**STATEMENT ON BEHALF OF BIRMINGHAM CITY
COUNCIL**

Main issue: Are the Plan's proposals for these key growth areas justified and deliverable?

Issue 1

a) Do policies GA.1 to GA4 and GA7 to GA10 provide sufficient detail and certainty over what will be permitted and where, within the areas that they cover?

- 1.1 Each of the Growth Area policies (GA1 to GA4 and GA7 to GA10) provides a strategic framework to guide the development of these important Growth Areas over the lifetime of the BDP. The policies provide sufficient guidance for each area to enable the decision maker to determine planning applications, by:
- Setting out the level of growth each area will deliver, implementing the thematic policies of the plan, e.g. numbers of new homes, amount of retail floorspace
 - Setting out guidance on the types of uses / developments that will be supported in each area
 - Identifying key sites and areas for development, which will help deliver the City's growth aspirations
 - Providing appropriate guidance on transportation and other infrastructure requirements for the area.
- 1.2 The extent of each Growth Area is identified on the Policies Map to define clearly the spatial area in which these policies apply. The accompanying GA plans within the BDP support this approach by providing a graphic aid supporting the understanding of how the area will grow (see Q22 in Birmingham City Council's response to the Inspector's initial questions – EXAM2C).

b) Is the proposed division between the role of these policies and the roles of any adopted and proposed Area Action Plans, Supplementary Planning Documents and Masterplans appropriate, and are their respective roles made sufficiently clear?

- 1.3 The Growth Area policies make clear reference to the supporting planning documents that are relevant to each area, and the role they play in helping to drive the delivery of growth. These documents provide additional detail to support the implementation of the strategic approach set out in the Growth Area policies.
- 1.4 The preparation of more detailed plans to guide delivery in areas of change has proved to be successful in the past and will continue. The approach taken for each Growth Area reflects each area's challenges and the level of guidance needed to bring forward development. This includes statutory plans, such as the adopted / emerging Area Action Plans (Longbridge (G5), Bordesley Park (G4) and Aston, Newtown and Lozells (G2)), and Neighbourhood Plans (Balsall Heath and the Jewellery Quarter). Non-statutory plans, such as regeneration frameworks and development briefs, are also utilised where they can help promote development. The regular updates to the Strategic Housing Land Availability Assessment (SHLAA) and Employment Land reviews will also help to guide development.

Issue 2

Is there evidence to show that the amounts of development sought by the Plan in each of the areas covered by these policies are justified and deliverable?

- 2.1 The long term development of each of the Growth Areas is underpinned by the thematic

- policies within the BDP and the supporting evidence base. Specifically,
 - the capacity for new homes in each of the areas is based on the SHLAA and supports the Homes and Neighbourhoods policies of the Plan (TP26-34).
 - the retail floorspace requirements are derived from the Birmingham Retail Needs Assessment Update (EMP5 and 6) and support the Centres policies contained in the BDP (TP20-24).
 - the employment and office floorspace requirements are derived from the Employment Land & Office Targets Study (EMP4) and support the employment land policies of the Plan (TP16-19).
 - the infrastructure requirements identified in the Growth Area policies are reflected in the Infrastructure Delivery Plan (IMP1) and support the Implementation section of the BDP.
- 2.2 The Site Delivery Plan (IMP2) demonstrates the capacity in the City to achieving the overall growth aspirations. This document demonstrates two important aspects – delivery and capacity:
- Since the BDP Strategy is based primarily on the delivery of brownfield development, there are inevitably requirements for remediation, demolition and land assembly in relation to some development locations. However the analysis within the Site Delivery Plan confirms that these requirements are relatively few in number, are capable of being addressed, that there are no ‘showstoppers’, and that development will be supported by a targeted infrastructure delivery programme.
 - The Site Delivery Plan identifies the development capacity of large sites in each Growth Area and the contribution they make to each area’s growth proposals expressed in the policies. This demonstrates confidence in the City’s ability to achieve its overall development aspirations
- 2.3 Further details are also contained in the Statement for Matter N regarding the implementation of the Plan which shows the BDP is a deliverable strategy.

City Centre

Issue 3

Is it appropriate for policy GA.1 to limit retail development to specify that retail development as part of mixed-use redevelopments throughout the City Centre should be “small-scale”?

- 3.1 The Council recognises that within the city centre it will be appropriate for some retail development to take place within mixed-use schemes outside the existing Retail Core. It is important that this should not be at a scale which would divert activity and investment away from the Retail Core itself, but it is recognised that the quantum of retail development may in some cases be above what might realistically be understood by ‘small-scale’. The Council has therefore proposed a modification to clarify this (Main Modification MM12).

Amend third sentence of third paragraph of the policy as follows:

‘Small Appropriate scale retail development will continue to be supported **where it complements the existing Retail Core and** as part of mixed use redevelopments throughout the City Centre’

Issue 4

Should policy GA1.2 identify additional sites/areas for development in the City Centre?

- 4.1 The Council does not consider that this would be appropriate. The policy is intended to provide clear direction as to the major areas for growth and change within the City Centre and to demonstrate in general terms how the levels of growth proposed in the Plan will be delivered while retaining the flexibility for more detailed schemes to be developed over an appropriate timescale. The Areas of Transformation have emerged from an extensive process of discussion and debate through the Big City Plan process, and the Council considers that they provide the correct focus for growth and change over the plan period. The broader growth of the City Centre is also set out in GA1.3 through the role that development has in supporting and strengthening the character of the Quarters in the City Centre.
- 4.2 By definition all opportunities for growth in the city centre will come about through redevelopment. The Council has extensive experience of promoting and enabling such schemes within the city centre successfully over the last 25 years. Based on this experience, the Council is strongly of the view that it is not realistic or helpful to delivery to attempt to define sites and schemes of development precisely too far in advance. Inevitably circumstances change, new opportunities arise and such plans rapidly become out-of-date.
- 4.3 The approach taken therefore is to identify strategic sites within the BDP, with additional sites identified in the evidence base, including the SHLAA and Site Delivery Plan, which will continue to be updated regularly.

Issue 5

Does the Plan give sufficient recognition to the role and impact of HS2 in the City Centre?

- 5.1 The policy already makes clear reference to HS2 and the way that development needs to be integrated with the City Centre and other development proposals. The Council has proposed a modification (see MM24 in Proposed Main Modifications Schedule (EXAM2A)) to make reference to the Birmingham Curzon HS2 Masterplan. The City Council has prepared this detailed guidance to inform the development of HS2 and plan to maximise the benefits of the project to the wider City Centre. The City Council and the Greater Birmingham & Solihull Local Enterprise Partnership are working on a HS2 Growth Strategy with Government to help deliver these benefits.
- 5.2 The strategy for the City Centre is not predicated on the delivery of HS2. However the Council strongly supports HS2 which offers the potential to drive forward regeneration and help deliver growth targets.
- 5.3 The delivery of HS2 is taking place through a Hybrid Parliamentary Bill which will be followed by a post Bill planning regime. There will be ongoing discussions regarding the implementation of the project. For this reason it is considered that the BDP should not seek to be more prescriptive in relation to HS2 at this stage. In addition the impact of HS2 on the City Centre will need to be managed during and beyond the Plan period. The BDP will be reviewed during this time and the impact of HS2 will be reviewed as it comes forward to ensure benefits are realised.

Issue 6

Should policy GA1.4 identify alternative / additional new railway stations in the city centre?

- 6.1 Policy GA1.4 supports improvements to accessibility to and within the City Centre, identifying types of projects (including public transport) which can contribute to this. This approach supports the development of existing projects identified in the Connectivity Chapter policies of the BDP and the supporting evidence base (including the Infrastructure Delivery Plan – add ref), including HS2 and the Metro extension to Centenary Square. Therefore appropriate links and references are already made to new rail, Metro and rapid transit proposals in GA1.4 and in the BDP. The policy will also support future transport proposals which are not currently identified where they help meet the policy objective.

Greater Icknield (GA2)

Issue 7

Should the surplus land at City Hospital be allocated solely for residential development and not for working and local shopping facilities? Does the plan accurately reflect the circumstances of the hospital relocation?

- 7.1 The proposals for working and local shopping facilities are intended only to meet the needs of the development to promote sustainable forms of development and minimise car borne journeys. They are not intended to imply that retail development that would attract customers from outside the development would be acceptable and should not be seen as an extension to Dudley Road Local Centre. This is explained in further detail in the draft Greater Icknield Masterplan (G6).
- 7.2 It is accepted that the pre-submission version of the plan was not clear on the detail of the circumstances of the hospital relocation. The City Council has proposed a minor modification to address this oversight (AM15 of EXAM 2B).

Amend the second sentence of paragraph 5.38 as follows:

‘Following ~~it's the~~ relocation of **most of its services** westwards along the A457 **to the new Midland Metropolitan Hospital,**’

Issue 8

Does policy GA2 make adequate reference to the protection and enhancement of the canals in the Greater Icknield area?

- 8.1 The importance of the canal network is recognised in particular through the final paragraph of policy TP12 which provides the basis and principles for the protection and enhancement of this asset across the City. There are also references to the importance of canals in policies TP2 and TP6. As noted by the Canal & Rivers Trust in their representations (bp1161) there are a number of requirements that they have as a statutory consultee on any development that affects the canal network that provide further safeguards against inappropriate

development. Specific policy wording solely for the canals within the Greater Icknield area is not considered necessary given that this is already addressed at a City wide level.

Aston, Newtown and Lozells (GA3)

Issue 9

Does policy GA.3 give adequate recognition to the role of sites other than the former BCU teaching campus in improving pedestrian linkages?

- 9.1 The adopted Aston, Newtown and Lozells Area Action Plan (AAP) (G2) contains specific policies on improving pedestrian/ cycle linkages within Perry Barr District Centre which also recognises the role of specific sites and the need for better connectivity between the distinct areas of the centre. This is covered specifically in paragraphs 4.2 -4 4.4 and Policies LC1, LC1A, T8 and T9 of the AAP.
- 9.2 Specific reference to BCU is made in Policy GA3 for the purpose of replacing Policy ED1 of the AAP.

Issue 10

Is the proposed redevelopment of Perry Barr stadium justified?

- 10.1 Policy LC1 within the adopted AAP refers to the potential redevelopment of Perry Barr Stadium and the need to provide for equivalent provision should it be redeveloped.
- 10.2 The AAP Inspector concluded in his report (January 2012) that:

“It is clear that the stadium, which is close to the District Centre, has the potential to offer additional leisure facilities and a greater variety of uses for the local and wider community. This could be thwarted if the AAP were to be modified to restrict the site to the current use of speedway racing and similar or associated uses. Policy LC1 states that in the event of the stadium being redeveloped, an equivalent provision should be made and be at least as accessible as the current stadium. This safeguards the current users and provides flexibility in relation to the future of the District Centre and the needs of the community.”

“Consequently, the plan provides a sound framework for enabling the growth and enhancement of the Perry Barr/Birchfield District Centre for the benefit of the plan area as a whole.”

It is considered that this reasoning continues to be sound today.

Sutton Coldfield Town Centre (GA4)

Issue 11

Are the initiatives set out in policy GA4 adequate to achieve the objectives of ongoing growth and diversification of uses in the town centre?

- 11.1 The policy directly supports the ongoing growth and diversification of uses in the town centre and proposes a significant scale of new retail and office development to support this. The policy seeks to encourage new residential development within the town centre which

will help to diversify it. The policy also seeks public realm improvements to improve the visitor experience and general perception of the town centre and actively encourages the redevelopment of the primary shopping area where the main proportion of new development is anticipated to take place to enable growth. The proposed improvements to both public transport provision and general flow of traffic through the bus interchange and relief road will both also actively enable growth. The environmental improvements to the High Street Conservation Area that will be enabled by the delivery of the relief road will allow further diversification of uses in an area of the town centre currently constrained by the very narrow pavements currently running along the High Street.

- 11.2 Policy TP22 provides further support for the diversification of centres across the City. As with other parts of the BDP, the Plan seeks to facilitate sustainable development – although, ultimately, whether it is carried forward will largely depend upon the enthusiasm of the market to do so.

Issue 12

Should there be a specific reference in the policy to Plants Brook?

- 12.1 This is not supported. The issue of culverted watercourses across the City and their potential for renaturalisation is addressed by policy TP6 as noted in the Environment Agency's original representation (bp2539) and it is not considered necessary to include a specific reference here. The City Council support the opening up of culverted watercourses where feasible and the policy in relation to this has been clarified (see main modification MM52 in EXAM 2A).
- 12.2 It is not therefore considered that there is a need for a specific reference to Plants Brook. It should also be noted that this watercourse runs in a culvert through existing development within Sutton Coldfield Town Centre. For this reason opening up the Brook is not likely to be a practical proposition in the foreseeable future.

Bordesley Park (GA7)

Issue 13

Does policy GA7 take sufficient account of the existing wheeled sports users at the Birmingham Wheels site?

- 13.1 Policy GA7 Bordesley Park emphasises the development and regeneration being promoted through the preparation of the Bordesley Park Area Action Plan. To date extensive consultation including on the Preferred Options Report (July 2013) (G4).
- 13.2 The emerging AAP identifies five key areas of change which are considered to have the greatest potential for development and to deliver benefits for the area in terms of new jobs, homes, and improved local centres. The five areas comprise:
- The Wheels site and environs
 - The Cherrywood Road area
 - Adderley Park

- Alum Rock Road local centre
- Small Heath local centre.

- 13.3 The BDP seeks to make the best and most efficient use of brownfield land and opportunities within the urban area.
- 13.4 The Wheels site and environs represents such an opportunity and currently comprises a range of land uses which includes the various wheel based sporting activities (including stock cars, go-karting and speed skating), existing business uses including storage, distribution, and depot uses and some existing terraced housing.
- 13.5 The potential redevelopment of the Wheels site for industrial and employment uses would contribute to the city's industrial land supply. The proposal within the Preferred Options Report reflects the shortage of employment land within Birmingham as evidenced within the Employment Land Review and the work undertaken by Warwick Economic & Development (WECD) (EMP3). This position is exacerbated by the Secretary of State for Transport safeguarding land within East Birmingham for the new high speed rail link (HS2) between London and the West Midlands including industrial land at Washwood Heath.
- 13.6 Paragraph 5.72 of the BDP sets out the key issues that will need to be addressed at the Wheels site in order for proposals to be brought forward, with particular reference to land contamination and infrastructure. Main Modification MM33 (EXAM2A) proposes additional text that further acknowledges the current activities on site. The proposed additional text at the end of paragraph 5.72 is "...as would the future of the existing sports facilities and other occupiers of the site".
- 13.7 Paragraph 5.76 of the BDP outlines that the preparation of the AAP will be in cooperation with a wide range of partners, agencies, and the local community. Although not detailed, this has and will include residents, businesses, community groups, schools and other educational institutions as well as the owners and occupiers of the sites within the key areas of change identified. This has and will include all occupiers of the Wheels site.
- 13.8 The AAP will be the principal mechanism which will consider the detailed development opportunities and proposals within the AAP area, including at the Wheels site. This will include working with the existing occupiers on potential relocation opportunities if that becomes necessary.
- 13.9 Work is currently underway on preparing the Pre-submission version of the APP.

Issue 14

Should the former Smith & Nephew site on Alum Rock Road be included in the AAP area?

- 14.1 The City Council does not consider that the boundary of the AAP should be amended to include the former Smith & Nephew site.
- 14.2 The Bordesley Park Area Action Plan boundary was agreed, along with a resolution to progress the plan, following agreement of a report to the former Cabinet Member for

Regeneration on 1 July 2009. Consultation has now taken place on the Preferred Options Report (G4). It is not considered appropriate to amend the plan boundary as this has not been raised during the consultation on the AAP itself. The AAP could be unnecessarily delayed should its boundary be amended at this late stage. Although just outside the AAP boundary, the Preferred Options Report (G4) does make reference to the former Smith & Nephew site having potential for residential and/or education uses (Neighbourhood 2 – Washwood Heath). This is indicated in text and on the proposals plan.

- 14.3 The City Council has been supportive of the redevelopment of the Smith & Nephew site since manufacturing stopped on site and the factory became vacant
- 14.4 Although the Council was initially concerned about the loss of Smith & Nephew as an industrial site, it was subsequently considered that the site was not best suited for industrial redevelopment given its location, access and the predominantly residential surroundings.
- 14.5 The potential for residential development was confirmed through the inclusion of the site in the SHLAA as references E282 and E510.
- 14.6 A number of development proposals have been considered since the site was acquired by the present owners. This has included:
- An application for residential development and business units and nursery in 2010 submitted by the owner (2010/00465/PA – outline with all matters reserved approved following signing of S106 Agreement).
 - An application for a primary school on the eastern half of the site submitted by the Council's Education Service (2010/00465/PA) which was also approved in 2010.
- 14.7 The two consented schemes were not implemented due to the recession and the down turn in the property and housing market, and a review of local school place needs by the Education Service.
- 14.8 Discussions between the City Council and the owners recommenced in 2012 regarding the proposed submission of revised proposals for residential development across the whole site. The City Council has again supported the principle of residential development and has provided detailed urban design, planning and transportation comments on emerging proposals. A revised application for residential development was registered on 2 September 2014 (Reference 2014/06294/PA). The application is outline for up to 122 residential units and incorporates many of the comments and suggestions made by officers during the pre-application discussions.
- 14.9 The City Council remains very supportive of the development of the former Smith & Nephew site, which has now been vacant for several years and which has provided a very poor environment and outlook for surrounding occupiers. It is not considered that the development of the site is prejudiced in any way by not being included within the boundary of the AAP.

Issue 15

Should the policy give greater recognition to the need for improvements to the River Rea and the east Birmingham rapid transit route?

River Rea

- 15.1 Policy GA7 does not give explicit recognition to the need to improve the River Rea, but it does identify the need for a ‘clean, safe, attractive and sustainable environment’ of which watercourses such as the Rea would clearly be a part. In addition, there are a number of references elsewhere within the BDP which reflect and recognise the importance of rivers (including the River Rea) in the city, including:
- Paragraphs 3.8 and 3.9 which recognise the need for sustainable management of the city’s watercourses and the importance of green infrastructure.
 - Policy TP6 (as modified by proposed main modification MM52) which identifies the importance of rivers in the city’s green infrastructure network)
 - Policy TP7, which includes references to waterways within the context of green infrastructure.
 - Policy TP8 on the natural environment
- 15.2 In addition the Sustainable Management of Urban Rivers and Floodplains (SMURF) SPD (ES1) sets out policies for development near to river corridors, including measures to improve the water quality and to prevent pollution of the river corridors, to maintain or where appropriate restore the natural character of the river channel, and to safeguard, enhance and restore the nature conservation and landscape value of the river corridor.
- 15.3 As it runs through the Bordesley Park area, the River Rea passes through the established industrial neighbourhood of Vauxhall (part of the City’s identified core employment land), and is contained within an engineered channel in order to manage flood risk. The majority of its course within the AAP area is within the HS2 safeguarded area designated by the Secretary of State for Transport in order to protect land required to construct and operate the proposed High Speed rail route between London and the West Midlands from conflicting development.
- 15.4 The River Rea will be identified in the Bordesley Park AAP. Apart from the impact of HS2, the AAP will not identify the Vauxhall area for significant change. The AAP Preferred Options Report (G4) does place emphasis on the importance of green infrastructure and of improving the environment within the area generally. The Preferred Options Report on page 41 identifies a number of opportunities within the Vauxhall Neighbourhood including:
- Enhancements to the River Rea, opening it up to public view where possible and working with the Environment Agency to reduce the risks of flooding.*
- 15.5 Should it be necessary to provide more detail on the approach to the River Rea within the AAP area then it would be appropriate for this to be included in the AAP rather than the BDP.

Rapid Transit

- 15.6 This policy as written, and in conjunction with other policies in the BDP, gives sufficient recognition and support to the proposed rapid transit route through East Birmingham.
- 15.7 The policy refers to enhanced public transport. Paragraph 5.75 makes specific reference to Rapid Transit through the area linking the City Centre with the Airport & NEC.
- 15.8 Policy TP40 identifies particular support for a rapid transit link between the City Centre and Birmingham Airport and the HS2 interchange. Paragraph 9.31 includes further detail, noting that this will serve major growth, development and regeneration sites, including Bordesley Park.
- 15.9 The details of the proposed route(s) have varied during the preparation of the BDP, and are still subject to a degree of change depending on the outcome of forthcoming consultation (largely focused on the city centre part of a metro route but in any case potentially affecting the inner east Birmingham part of any route). Current proposals would see a SPRINT (high quality bus) route along the A45 (the southern boundary of the Bordesley Park area), and a metro route passing through the AAP area along Kingston Road/Cattell Road/Bordesley Green Road which would connect to the City Centre and proposed HS2 Curzon Street Station in the west and the Airport, NEC and proposed HS2 Interchange Station in the east.
- 15.10 The inclusion of this detailed routing information in the BDP at this stage would not be appropriate or timely due to the still significant potential for change. More detail on the proposed routes will be provided in the Bordesley Park AAP. The proposed routes will be/are identified on plans, and the implications of the routes will be addressed – in particular in relation to the proposed key areas of change within the AAP.

Eastern Triangle (GA8)

Issue 16

Is Stechford's designation as a Local Centre appropriate in the context of the Eastern Triangle proposals, or should it be upgraded?

- 16.1 Policy GA8 sets out the development opportunities across the Eastern Triangle area. This primarily focuses on housing growth and opportunities presented by the key local centres of Meadway, Shard End and Stechford.
- 16.2 The policy for retail growth in the area has grown out of the findings of the Local Centres Strategy (2006)(EMP8) which outlined that East Birmingham contained a network of poorer centres and a lack of major food stores. The area to the south of the River Cole Valley was particularly noted as having gaps in retail provision, with centres of limited scale and poor quality. The Meadway was then acknowledged as having the greatest potential to expand – particularly in connection with the development of proposals to improve housing within this part of the city. The development of proposals for Shard End was also noted.
- 16.3 Shard End local centre has now been redeveloped and a number of other centres have also profited from development and regeneration. This includes the Fox and Goose centre to the north, Swan Yardley to the south and Sheldon to the south east, with each now

accommodating a new food store and benefitting from associated development and environmental improvements.

- 16.4 Within the Triangle area, Meadway is still recognised as having the greatest scope for development. This relates to the fact that the existing shopping centre is in the freehold ownership of the City Council and that a number of multi storey housing blocks that adjoined the centre have already been demolished. The adjoining open space also provides the opportunity to be reconfigured to facilitate development and the delivery of other benefits for the area. The Meadway is in a very accessible location including lying on the route of the proposed Rapid Transit (Metro) route through East Birmingham. Current options for the Meadway comprise the potential demolition of the existing centre and development of a new centre alongside the provision of new homes. The Meadway is identified within the network and hierarchy of centres (Policy TP20) as a District Growth Point.
- 16.5 Stechford Local Centre is located to the south of Stechford rail station and is identified within the network and hierarchy of centres (policy TP20) as a Local Centre. The centre as defined within the Shopping and Local Centres SPD (EMP9) accords with the definition of a Local centre within paragraph 7.22 of the BDP; namely a significant group of local shops and services, usually including one or more smaller foodstore. To the north of the rail station and the West Coast Rail Line, but outside the Centre boundary, is Stechford Retail Park with the Meadway 1 mile to the south east.
- 16.6 The focus for development at Stechford is on housing growth – particularly with sites to the north of the current centre and railway. The defined centre consists of smaller retail and business units facing Station Road and presents less opportunity for new retail development than the Meadway. However, given the potential redevelopment of the Stechford Cascades Leisure Centre which lies within the local centre boundary, there could be some opportunity for additional complementary retail provision.
- 16.7 At Stechford growth will therefore be promoted in line with the size and function of the centre. Policy GA8 identifies the opportunity for “the growth and improvement of Stechford Local Centre to meet the retail, service and community needs of the local area”.
- 16.8 The City Council is proposing to prepare further planning guidance for the Stechford area which will consider additional development opportunities. This will also consider the design of the proposed Station Road, Flaxley Road, Iron Lane junction improvement which has now secured funding through the Greater Birmingham and Solihull LEP Growth Deal.

Selly Oak and South Edgbaston (GA9)

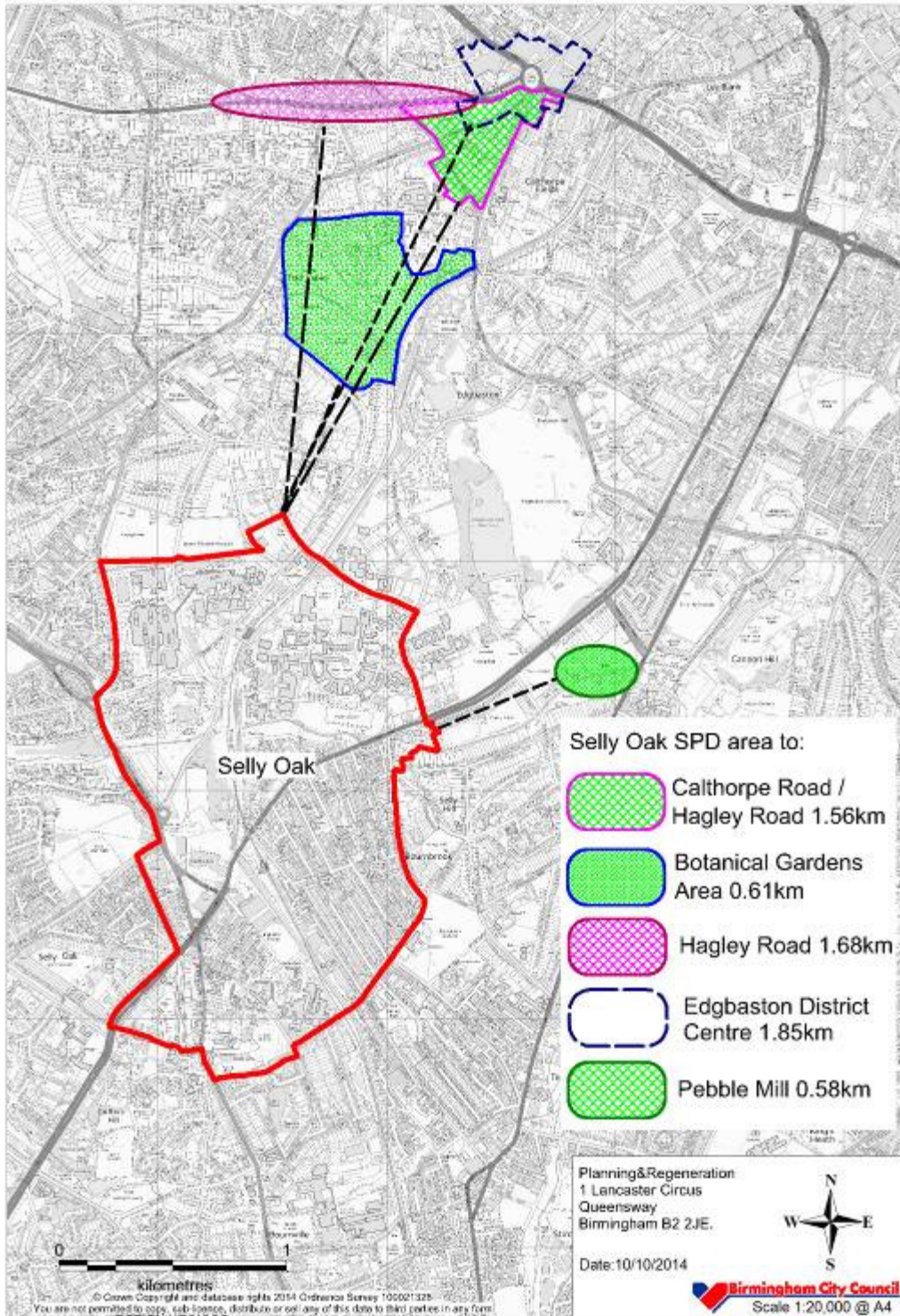
Issue 17

Should there be a new or extended GA policy area covering the northern and western parts of Edgbaston, next to the City Centre?

- 17.1 The Selly Oak and South Edgbaston area shown on Plan 13 of the BDP covers Birmingham University campus, the Queen Elizabeth Hospital campus and vacant sites totalling over 35ha including the Birmingham Battery site, and the Selly Oak hospital site. Over the Plan period the further significant change is proposed. Key elements include:
- The forthcoming Life Sciences campus development on the Birmingham Battery site and associated designation of the Selly Oak area as one of the city's economic zones;

- New retail led mixed use development in and adjoining Selly Oak District Centre;
 - Further significant development in the University of Birmingham;
 - Further investment in the hospital campus including redevelopment/extension of buildings to accommodate the future needs of the Women's Hospital and Children's Hospital; and
 - Residential development for around 600 dwellings on the Selly Oak hospital site.
- 17.2 Selly Oak and South Edgbaston is therefore one of the city's most significant and long standing regeneration opportunities.
- 17.3 The Selly Oak Supplementary Planning Document is currently being prepared to add further detail to this Growth Area policy. The Draft SPD (EXAM20) is attached and has recently been out to statutory public consultation during July and August 2014. The boundary of the growth area in policy GA9 follows the boundary in the Selly Oak SPD.
- 17.4 To the north of the Selly Oak and South Edgbaston growth area lies:
- Edgbaston District Centre;
 - Offices and a number of hotels around Edgbaston centre and on the Hagley Road (A456);
 - Significant established residential areas in Edgbaston; and
 - Other features and assets (including Birmingham Botanical Gardens), a number of mainly private clinics and hospitals and educational establishments.
- 17.5 Most of the area is included in the Edgbaston Conservation Area. This area also comprises a large part of the Calthorpe Estate land holdings.
- 17.6 The aspirations for growth to the north of Growth Area GA9 are well known. They include:
- The area to the west of Edgbaston District Centre (generally bounded by Calthorpe Road, Highfield Road and Hagley Road) for which a Development Framework is being prepared. This recognises that the office market in this part of the city is undergoing change and seeks to introduce a mix of retail and leisure uses to support the office sector, and other uses such as medical and residential uses to diversify the area. The draft Edgbaston Framework (EXAM23) was approved for public consultation in Sept 2014 and is attached.
 - The Botanical Gardens and surrounding area (generally bounded by Westbourne Road, Richmond Hill Road, Farquhar Road and the railway) . The City Council is working with partners including Calthorpe Estates to prepare an informal framework to facilitate investment in the Botanical Gardens and surrounding sports and education providers. The draft Wider Botanical Gardens Area Framework (EXAM22) is attached. It was approved in January 2014 and was the subject of consultation from February to April 2014, and is currently awaiting adoption by the Cabinet Member for Development, Transport and the Economy.

- Hagley Road has been identified as offering potential for redevelopment or re-use of sites/buildings for Life Sciences uses, building on the success of the Life Sciences Campus at Selly Oak. An informal framework/prospectus is being prepared to highlight development opportunities in south Birmingham, including Hagley Road.
 - Key partners including Calthorpe Estates, Medilink, University Hospital Birmingham NHS Trust and the University of Birmingham “designated” a large area (12 sq.km) between Hagley Road (A456) and Bristol Road (A38) as the Edgbaston Medical Quarter in 2013. This recognized that the area is an important research and healthcare district, with a proliferation of medical organisations, including around 80 hospitals and specialist care centres as well as centres for medical research and training facilities.
 - Edgbaston District Centre has received investment in the new Morrison’s store on Hagley Road and proposals for other major sites have consent and are being implemented.
 - Other smaller sites and proposals - for example a number of housing sites are identified in the evidence base (SHLAA etc) but most have planning permission.
- 17.7 To the east of the growth area the vast majority of the Pebble Mill site has planning permission for medical healthcare and associated uses and development of the Dental Hospital is well underway. The Plan below shows the relative location of these sites.
- 17.8 Whilst the City Council recognises that Edgbaston has further potential to accommodate sustainable growth, these opportunities are either covered by policies in the BDP and/ or are being addressed through planning frameworks being prepared in partnership with key stakeholders or through planning applications on specific sites.
- 17.9 In addition, the scale of development within the area to the north of the Selly Oak/South Edgbaston Growth Area is not sufficiently large to warrant dedicated policy and the geographical distribution of these locations is generally dispersed.
- 17.10 For these reasons, the council does not consider that an extension of the Selly Oak and South Edgbaston growth area is appropriate, nor is it considered necessary to identify additional areas of Edgbaston as a Growth Point in the Plan.



Longbridge

Issue 18

Is it appropriate for policy GA10 to state that development will proceed in accordance with the adopted AAP, especially with regard to Longbridge's status as a Local Centre?

- 18.1 Following the closure of the MG Rover plant on 2005 Birmingham City Council and Bromsgrove District Council worked closely with St Modwen (the principal landowner) and other partners – including the local community and Bromsgrove and Worcestershire Councils - to prepare the Longbridge Area Action Plan (LAAP) (G5). The Plan was adopted in 2009.
- 18.2 The key proposals in the LAAP include:
- a) **Proposal LC1**- A new local centre on North Works comprising *“Retail (Class A1) of up to 13,500sq.m gross comprising: a superstore of up to 7,500sq.m gross floor space.....and additional comparison retail floor space of up to 6,000sq.m gross, alongside other retail uses (A2, A3, A4 and A5), D2 leisure uses, offices (up to 10,000sq.m.), residential (approx. 400 dwellings) and appropriate commercial uses e.g. hotel.”* The level of retail development was based on a Retail Assessment.
 - b) **Proposal EZ2**- Retention of the Nanjing factory (now M.G. Motors UK).
 - c) **Proposal EZ1** - An employment zone for general, light industrial and warehousing and live/work units, biomass and recycling facilities, located between the local centre and Nanjing
 - d) **Proposal RIS1**- A 25ha Regional Investment Site on part of the former West Works and on North Works car park.
 - e) **Proposal H1** - Housing on West Works adjacent to the RIS.
 - f) **Proposal H2** - Housing on the East Works site (in Bromsgrove).
 - g) **Proposal EZ3**- Employment uses on the Cofton Centre site (in Bromsgrove).
- 18.3 The LAAP recognises the need for flexibility, for example:
- Para 3.116 states that *“Surplus land within EZ2 is likely to become available for development. Future uses within EZ2 will be considered within the context of the overall aims of the Area Action Plan and the adjoining land uses.”*
 - Para 4.1 recognises the need for flexibility to ensure proposals to be both deliverable and viable.
 - Para 4.5 recognises that *“the previously developed nature of the site, which requires substantial remediation and other abnormal costs, means that viability is likely to be an issue in times of difficult market conditions. In such circumstances a flexible approach to any negotiations at planning application stage will be required to ensure viability and that the delivery of any acceptable scheme on the ground is not constrained or delayed.”*
- 18.4 Progress to date is as follows:
- a) **Proposal LC1:**
 - the new Bournville College was completed and opened in 2011.
 - The first major phases of the new local centre- planning consent granted in September 2011. Development completed to date comprises a Sainsbury's superstore, small retail units for A1 also for financial and professional services (A2) restaurants/cafes public houses and hot food take-aways, offices, and hotel.The consent granted in 2011 for the local centre also included a terrace of 4 larger retail (Class A1) units totalling 4,383 sq.m. gross but these were not implemented. In

September 2014 planning permission was granted for relocation of the previously approved retail units (now to provide 9 units of 4,383sq.m. gross), together with a Marks and Spencer store of 14,832 sq.m. gross and 589 sq.m. of A3/A5 uses. Known as Longbridge Town Centre Phase 2. The consented scheme extends beyond the boundary of the local centre into land covered by Proposal EZ1. Two further sites remain to the south of the new park for leisure uses and office/employment use (approx. 3ha).

- b) **Proposal EZ2**- Since the LAAP was adopted a number of sites within EZ2 have been released for development by Nanjing/M.G. Motors UK as they are no longer required by the company. Development subsequently approved comprises:
- Lickey Road Phases 1 and Phase 2- planning consents were granted in 2010 and 2012 for over 130 dwellings, and development is now complete.
 - Lickey Road Phase 3 planning permission was granted in February 2014 for a further 82 dwellings.
 - Lowhill Lane- outline planning permission for residential was granted in February 2014.
- c) **Proposal EZ1**- Planning permission was granted in September 2014 for a 260 bed extra care home on the Lickey Road frontage. Land to the rear has residential consent - known as Lickey Road Phase 4 – granted in February 2014 but this is partly superseded by the extra care scheme. Land to the rear of this site is being retained for employment use (approx. 7 ha). (All of these proposals extend partly into EZ2).
- d) **Proposal RIS1**- Development completed to date on the North Works car park comprises:
- Innovation Centre and 2 Devon Way.
 - Construction College.
 - Youth Centre (the Factory).
- Consent was granted in 2011 for a further technology unit at 3 Devon Way on North Works car park.
No progress as yet with employment on West works (approx. 20+ha)- awaiting delivery of infrastructure.
- e) **Proposal H1** – West Works -no progress as yet
- f) **Proposal H2** – Planning consent has been granted for 700 houses and new park, and construction is underway.
- g) **Proposal EZ3** – This site is substantially complete- with one site remaining.

18.5 Policy TP 20 of the BDP identifies Longbridge as a Local Centre. It also states that the scale of any future developments should be appropriate to the size and function of the centre and that comparison retail development in Local Centres should be aimed at catering for the local catchment population. Policy GA10 mirrors the LAAP in identifying scope for 13,500sq.m gross of retail floor space.

18.6 The Sainsbury's store, small units already constructed and the consented terrace of larger units (comprising 4,383sq.m gross) in overall terms takes up the 13,500sq.m gross A1 retail floor space envisaged in the AAP.

- 18.7 The consented Marks and Spencer (M&S) store provides an additional of 14,832 sq.m. gross. This therefore increases the total committed A1 retail floor space at Longbridge to 28,626sq.m gross.
- 18.8 In granting consent for M&S, the council considered that the case for and against the proposal was finely balanced. The Planning Committee report – Longbridge Town Centre Phase 2 (EXAM21)- is attached. The following key points are particularly relevant:
- It was noted that the proposal was contrary to policies in the LAAP and the degree of conflict was such that the application conflicts with the development plan when considered as a whole. The application could have been refused on this basis.
 - However, a store of the size proposed for M&S has a differing requirement to open A1, including catchment area for impact assessment and sequential site search requirements. The application was therefore assessed on the basis that M&S would be the named occupier of the 14,832sq.m retail unit. The applicants proved that M&S have a lease to occupy the unit for 45 years and a clause within the Section 106 legal agreement secures M&S as first occupant.
 - A sequential and impact assessment concluded that – whilst the M&S would have an adverse impact on Northfield - there is no clear evidence of a significant adverse impact on existing, proposed or committed investment in any of the centres within or beyond the identified catchment area. Similarly, there is no clear evidence of a significant adverse impact on the vitality and viability of any of the centres within or beyond the identified catchment area.
 - Paragraph 7.6 of the Planning Committee report states that the “conclusions in relation to impact are wholly dependent on M&S occupying the large retail unit, since open A1 non food retailing would cause a significant adverse impact on the overall viability and vitality of Northfield District Centre, and a more harmful investment impact in nearby centres.”
- 18.9 The recently approved scheme is significantly in excess of LAAP proposals, bringing the level of convenience and comparison floorspace to 28,626 sq.m. gross. This is similar to other district centres in the city, and there is now a case for recognising the centre as a District Centre in the hierarchy. Changes are therefore recommended to Policies GA10, TP20 and paragraph 7.28 to reflect this and the increased quantum of committed retail development. These changes will supersede that part of proposal LC1 of the Longbridge AAP that specifies the level of retail floorspace to be developed at Longbridge.
- 18.10 However the Council notes that St Modwen in their representations seek an additional 10,000sq.m of comparison retail floorspace, over and above that now approved - which is already more than twice the level proposed in the adopted LAAP. No robust assessment has been carried out to justify this and the Council considers that it would generate a significant risk to the health of other centres, notably Northfield, as identified in the assessment of the planning application for M&S. The changes to the BDP should therefore limit the level of gross A1 comparison and convenience retail to that approved, only permitting additional retail if it can be demonstrated that there will be no significant impact on investment in, and on the viability of centres in the catchment area. A revised wording is included at the end of this statement. Consequential changes are also required to policy TP20.

18.11 It is not considered that any further changes to the AAP are required. Some of the developments permitted have involved variations from the detail of the proposals set out in the AAP. However, with the exception of the Marks and Spencer's consent, none of these have involved a significant departure from the overall approach. The Council considers that this approach remains appropriate.

18.12 St Modwen has referred to differences in development standards between the LAAP and BDP. The Council considers that these can be taken into account on a case by case basis and do not themselves justify a revision or revocation of the LAAP. Similarly, with regard to CIL, this has not yet been adopted in Birmingham. Therefore there is no need for change to the LAAP as yet, but partial revocation could be possible if necessary in future when the Longbridge Infrastructure Tariff policies are superseded by CIL policy.

18.13 In addition the following should be noted:

- The LAAP was assessed for NPPF compliance in 2013, using the Local Plans and the National Planning Policy Framework Compatibility Self-Assessment Checklist. It was judged to address the relevant parts of the checklist and meet the NPPF's expectations.
- The adopted LAAP states that the Plan will be subject to a strategic review after 5 years (p52, para 4.32) to gauge its overall effectiveness, and consider any major changes in direction, policies and proposals. The 5 year Strategic Review of the LAAP is currently being undertaken, and this will determine the need for any future review of the LAAP.

a) Recommended change to policy GA10 (to amend main modification 60)

Amend Policy GA10 to read as follows:

An AAP is in place for the area to secure comprehensive regeneration and guide future development over a 15-20 year period. Future growth and development will be brought forward in line with the policies set out in the AAP.

The AAP has planned for the following levels of growth; 1450 new homes, one Regional Investment Site, 13,500 sq.m. gross of retail floorspace and 10,000 sq.m. office floorspace.

A total of 28,626 sq. m. of retail floorspace has been committed to date, reflecting changing circumstances since the AAP was adopted. Proposals for further retail development will only be permitted where it can be demonstrated through a full retail impact assessment that there will be no significant adverse impact on investment in, and on the viability of centres in the catchment area.

Reason

To reflect the grant of planning permission for a 14,832 sq m gross Marks and Spencer store at Longbridge.

a) Recommended change to policy TP20

Main Modification

Add **Longbridge** to the list of District Centres and delete it from the list of Local Centres.

Add in the table underneath District Centre after the last sentence.

In the case of Longbridge additional comparison retail floorspace will be limited to that set out in policy GA 10.

Reason

To reflect the grant of planning permission for a 14,832 sq m gross Marks and Spencer store at Longbridge.

b) Recommended change to paragraph 7.28

Amend to read:

~~The Longbridge AAP~~ **Policy GA10 sets out** specific levels of retail and office floorspace for the new centre at Longbridge.

Reason

To reflect the grant of planning permission for a 14,832 sq m gross Marks and Spencer store at Longbridge.