

clearthinking
COMMERCIAL PROPERTY ADVICE



**Birmingham Plan 2031 – Hearing Statement
Matter G: Spatial Delivery of Growth**

**Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004
Localism Act 2011**

On Behalf Of: Bloor Homes Western

Prepared By:

Simon Hawley BA (Hons) MA MRTPI

Harris Lamb | Grosvenor House | 75-76 Francis Road | Edgbaston | Birmingham B16 8SP

Telephone: 0121 455 9455 Facsimile: 0121 455 6595 E-mail: simon.hawley@harrislamb.com

Job Ref: P1081

Date: 6th October 2014


Birmingham Plan 2031 Hearing Statement

Matter G Spatial Delivery of Growth

Main Contributors

Simon Hawley, BA (Hons) MA MRTPI

Issued By


Signature.....


Print Name.....

Date.....

Approved By

Signature.....

Print Name.....

Date.....

CONTENTS

1.0 Matter G: Spatial Delivery of Growth

APPENDICES

1.0 Matter G: Spatial delivery of growth (BDP policies GA1-GA4 & GA7-GA10)

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

Questions:

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) 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?

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?

1.1 We support the general strategy to the delivery of growth identified by the introductory paragraphs to Chapter 5 – Spatial Delivery of Growth, of the submission draft Plan. It is our view that the proposed strategy is the most appropriate strategy when considered against the alternatives. However, our concern is that the suggested strategy is not reflected in the Plan's policies.

1.2 The draft Plan advises at paragraph 5.8 that there are a number of "key areas" that will "make significant contribution towards delivering these levels of growth in Policy PG1". It is confirmed that these key areas are identified on Plan 4 – Spatial Distribution of Growth, on page 34 of the Plan. Plan 4 identifies Northfield as one of the "key areas" that is expected to make a significant contribution towards housing delivery.

1.3 Paragraph 5.9 of the submission Plan goes on to advise that the focus for growth will be primarily through reusing existing urban land through

regeneration, renewal and redevelopment. The Plan confirms that development within the urban area will be prioritised ahead of land outside of the urban area (paragraph 3.25 amongst others). However, the City's administrative boundary is constrained and there is a limited amount of land in the urban area to accommodate future development. As a result land will need to be removed from the Green Belt for housing and employment development (paragraph 5.7) and it will be necessary for land to come forward for development in the neighbouring authority areas to meet the housing requirement.

- 1.4 The Plan identifies a series of specific areas at paragraph 5.10 and in the subsequent policies that are considered to be "key areas" where there is significant opportunity for growth. Whilst Northfield is identified as a "key area" for growth by Plan 4 of the draft Plan there are no development locations in or near to Northfield identified in paragraph 5.10 or the subsequent policies.
- 1.5 Furthermore, the Birmingham Development Plan Strategic Housing Land Assessment (SHLAA) 2014 (September 2014) includes a schedule of available sites by ward area in Appendix 8. This schedule identifies 20 sites that are potentially available for development in Northfield ward. These sites have a total capacity to deliver 240 dwellings. Whilst Northfield is identified as a "key area" for growth the plan does not identify any development locations in Northfield and the SHLAA suggests there is highly limited development capacity.
- 1.6 Whilst North Worcestershire Golf Club (NWGC) is in the Longbridge ward it is in close proximity to Northfield ward boundary. It provides the opportunity to deliver in the region of 800 dwellings to meet Northfield's growth requirements. HLPC submitted detailed representations to Matter E – Green Belt Policy, the Langley Sustainable Urban Extension (SUE) Allocation and the Peddimore Employment Allocation that confirm the development credentials of the NWGC and as such they are not repeated here. However, it should be noted that the NWGC can provide much

needed market and affordable housing along with a significant range of community facilities in a sustainable location.

1.7 The development of the NWGC is compatible with the requirements of paragraph 5.9 of the Submission plan that seeks to focus growth primarily through reusing existing urban land through regeneration, renewal and redevelopment. It also meets the requirements of draft Policy TP27 – The location of New Housing as:

- The site is in Flood Zone 1
- There are no known constraint to infrastructure provision
- It is in a suitable location with good access to a range of services and facilities as well as public transport opportunities.
- There is no known contamination
- The development will not harm historic, cultural or natural assets.
- The site is not a Core Employment Area, Green Belt or identified as open space by the policies map.

1.8 The development of the NWGC will also reduce the significant pressure that exists for land to be allocated for development in the Green Belt both within Birmingham city's administrative boundaries and neighbouring authorities boundaries to meet the significant housing requirement.

1.9 It is noted that the sites identified in paragraph 5.10 and its supporting policies range in size from 3,000 dwellings (Greater Icknield) to 700 dwellings (Selly Oak and South Edgbaston). Therefore the proposed development of the NWGC is clearly significant enough to warrant inclusion of a policy in the Plan to guide its redevelopment. HLPC's representations to Matter E include suggested wording of a policy for inclusion within the Plan to guide the development of the NWGC. It is our view that an additional policy should be added to Chapter 5 as follows:

North Worcestershire Golf Club

“The North Worcestershire Golf Club is considered to be a suitable location for residential development and appropriate complementary uses including laid out public accessible space. Development will be subject to the protection of important trees and habitats of biodiversity significance.

Around 800 new dwellings could be provided.”

- 1.10 This policy is broadly in accordance with draft policy S8 – North Worcestershire Golf Course, of the Birmingham Core Strategy 2026 – A Plan for Sustainable Growth, consultation document (December 2010). This policy identified the NWGC as a suitable location for a significant residential development. The inclusion of a policy for the development of the NWGC in the draft version of the Plan confirms that the proposed development is of a sufficient scale to warrant the inclusion of a specific policy in the Plan if the Inspector concludes that it is an appropriate location for residential development.

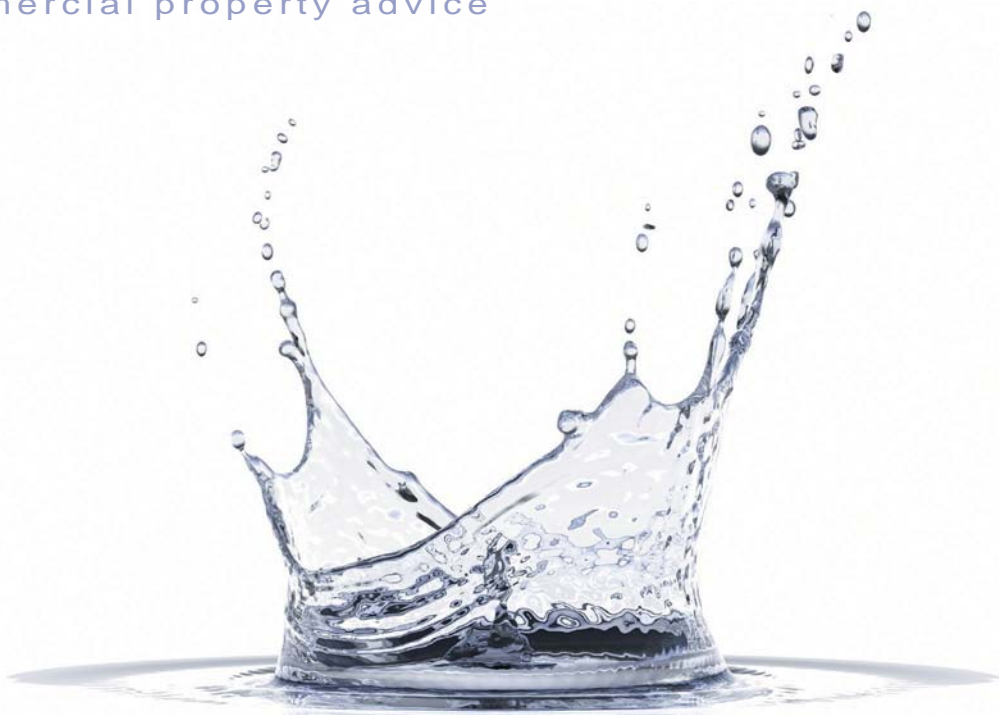
Longbridge GA10

18) Is it appropriate to GA10 to state that development will proceed in accordance with the adopted AAP, especially with regards to Longbridge’s status as a local centre.

- 1.11 Whilst we have no specific concern with Policy GA10, the way in which Longbridge is referred to in the policy and its supporting text is not clear. Whilst Policy GA10 is entitled “Longbridge”, it is focused on the section of Longbridge that comprised the former MG Rover plant. This is only a fraction of the Longbridge ward area. It is our view that, for clarity, the policy should be renamed Longbridge Growth Area which better reflects the status of the policy from a geographical perspective and the associated Area Action Plan.

clearthinking

commercial property advice



COMMERCIAL AGENCY



PROJECT
MANAGEMENT



BUILDING
CONSULTANCY



PROFESSIONAL
SERVICES



LAND & DEVELOPMENT



CORPORATE
SUPPORT



VALUATION



INVESTMENT



RATING



PLANNING
CONSULTANCY



PROPERTY
MANAGEMENT