



BIRMINGHAM PLAN 2031

Statement by West Midlands CPRE

Matter J: Employment and Waste provision (BDP policies TP15, TP17-19 & TP25)

Main issue: Do these policies provide a justified and effective basis for dealing with proposals for employment and waste-related development?

Questions:

1) (a) Is it appropriate, and consistent with national policy, for policy TP17 to limit development on Regional Investment Sites to the uses listed in the last paragraph of the policy?

1. Yes, we support that approach. It is similar to PA7 of the submitted RSS.

2. If Peddimore (Policy GA6) were approved (despite our objections) we would like to see similar restrictions imposed there with a more limited area allowed for B8 usages.

(b) Should the policy exclude B1(a) office use?

3. Yes. The RIS would cease to have the role and purposes for which they were originally declared if non-ancillary office development was permitted. The aim is to ensure that new and modernising industries can find land in the city. We have seen no evidence that there is a shortage of B1(a) office space in the City and other centres and no problem in adding more office floorspace in the City Centre if there is a demand.

4. Furthermore, the land cost (whether freehold or rental) of sites in the RISs would be inflated if B1(a) office use were to be permitted under the Plan. It is held down for the needs of new forms of industry partly by not permitting B1(a) uses at the sites.

5. Allowing office use on the RISs could prevent new and innovative industries being able to afford to locate in them because land prices and rental charges would be increased.

(c) Should the policy limit the sub-division of Regional Investment Sites?

6. Yes, if this ensures they fulfil their primary role. The 2012 Employment Land Review (EMP2) comments (Para 5.5) on the preponderance of good urban sites under 10 has. It would therefore make sense to seek to ensure those were used to

meet the needs for smaller sites so that the RISs were better able to meet the need for larger units.

7. Again if Policy GA6 Peddimore were approved (despite our objections) we would welcome similar limits on sub-division imposed there for similar reasons.

2) (a) Is it appropriate, and consistent with national policy, for policy TP18 to limit development in Core Employment Areas to the uses listed in the second paragraph of the policy?

8. Yes, we believe it is.

(b) Should other ancillary or sui generis uses be permitted in them?

9. Only on a small scale.

3) (a) Are policies TP18 and TP19 fully justified in their approach to the protection of employment land?

10. Yes, we support them, subject to comment we made in Matter A regarding housing provision which suggest that within this approach there may be some more opportunity for redundant industrial land to be used for housing.

(b) Should they be made more flexible?

11. We do not think so.

4) Does the reference to a Supplementary Planning Document in the second bullet point of policy TP19 comply with the Town and Country Planning (Local Planning) (England) Regulations 2012?

12. No comment.

5) Is the requirement in the last paragraph of policy TP19 for a financial contribution justified and consistent with national policy, including in respect of its impact on viability?

13. We do not object to this approach but it should be flexibly applied. We do not want to see sites remaining unused for either industry or housing because of such a stipulation.

6) What is the significance of the "HS2 Safeguarding Zone" designation on the Policies Map for the Core Employment Area(s) which it covers?

14. The impact of the HS2 Safeguarding Zone is significant both in terms of available sites and in terms of existing uses. As well as the Washwood Heath site, where CPRE Warwickshire, along with others is petitioning against that location for the HS2 High-speed train maintenance depot, the zone includes other areas of land, some in industrial use, totalling 136 has.

15. The 2012 Employment Land Review (doc. EMP2) stated: 'Until the detailed design of the HS2 line is published the exact impact of these proposals cannot be quantified; however it is clear that existing businesses will be affected to some degree.' Details have now been published in the HS2 Hybrid Bill and the effect is severe, both on existing businesses and by taking land needed for industrial development.
 16. There are objections to the loss of employment land both permanently to HS2, and temporary loss or sterilisation, with some land not likely to be able to come on the market or being used for employment until 2026. Uncertainty and interim planning constraints may generate a desire from companies to relocate to a more secure site, not within Birmingham.
 17. The Safeguarding Zone is significantly harmful because it is currently preventing permissions being granted for the development of employment land in suitable locations to meet the City's needs. This is notably the position at the major Core Employment Area shown on the Policies Map at Washwood Heath.
 18. The 'HS2 Phase One Safeguarding Directions with guidance notes for local planning authorities'¹ gives directions and guidance on the Safeguarding area.
 19. The Safeguarding Directions apply only when planning applications are made. What is issued regarding Local Plans is Guidance - see paras 21-26. This Guidance states that that if an objection relates 'solely to matters covered by the Safeguarding Directions' it is 'unlikely' to be 'relevant to consideration of the local plan document',
 20. In this case, the area around Washwood Heath is identified on the Policies Map as a Core Employment Area as well as being in the HS2 safeguarded area, so we consider its use a relevant matter for the Local Plan Examination.
 21. The CPRE Warwickshire Statement on Matter E addresses specifically why they believe the Maintenance Depot identified at Washwood Heath should be moved to a different location. We share their concerns about the use of this site.
 22. In relation to other parts of the Safeguarding Zone which affect existing industrial land (e.g. Saltley, Castle Bromwich) the Plan should make clear that the impact of Safeguarding will be monitored so that as much of the land as possible remains in employment use continuously, or returns to employment use after construction.
 23. The City Council should also seek to grant planning permission for employment uses within the Safeguarded Area where it would be unreasonable for HS2 Limited to object.
- 7) Should the Core Employment Area designation be removed from Ravenside Retail Park, and from Forward Park, Bagot St?*
24. No comment

12) Are these policies effectively drafted to achieve their intended purpose and do they provide a clear indication of how a decision-maker should react to a development proposal?

25. See above.

Note: <http://www.hs2.org.uk/developing-hs2/safeguarding>