

**BIRMINGHAM DEVELOPMENT PLAN EXAMINATION**

**MATTER K: CENTRES, RETAIL, AND TOURISM (BDP  
SECTION 7, POLICIES TP20-24)**

**STATEMENT ON BEHALF OF BIRMINGHAM CITY  
COUNCIL**

**Main issue: Are the Plan's policies towards town, district and local centres positively-prepared, justified and effective? Does the Plan make appropriate provision for retail, leisure and tourism and retail uses?**

## **General**

G.1 These policies support and underpin the NPPF. They ensure the vitality of centres for the future, by protecting the network of centres and also promoting their future uses through growth, supporting a range of shops including small and independent retailing and promoting a diverse range of uses. These policies also recognise centres as the heart of communities and identify that they have varying roles. They also reinforce Birmingham's importance as a tourist destination and continue to support this in the future.

## **Issue 1**

**Is policy TP20 fully consistent with national policy towards the location of main town centre uses?**

1.1 This policy satisfies NPPF requirements to provide a network and hierarchy of local centres in the plan, sets out the preferred locations for growth, based on that growth being located within the network of centres and positively encourages the vitality and viability of centres.

## **Issue 2**

**Does policy TP20 make adequate provision of suitable sites within town centres to meet the anticipated level of growth in retail, leisure and other main town centre uses?**

2.1 Policy TP20 sets out in the table the levels of comparison retail floorspace that should be accommodated over the plan period in each of the hierarchy of centres. These figures derive from the Retail Needs Assessment update 2013, (EMP 6). This complies with NPPF which states that Local Planning Authorities should undertake an assessment of the need to expand town centres. The comparison retail floorspace figures reflects the latest position in relation to per capita expenditure growth and the fact that internet sales are now expected to grow more rapidly.

2.2 The levels of comparison retail floorspace illustrated in policy TP20 and the specific details of the location of this growth can be found in the following policies: City Centre – GA1, Sutton Coldfield Town Centre – GA 4, Perry Barr – GA 3, Meadway – GA 8, Selly Oak – GA 9.

2.3 The levels of office development proposed within the Plan are derived from the Employment Land and Office Targets Study 2013 (EMP4) and the proposed distribution of this growth is also set out in policy TP20 with more detail provided in the Growth Area policies.

- 2.4 The Council has not attempted to assess future requirements for leisure or other town centre uses. Previous attempts to do this have failed to produce reliable information. However policy TP20 makes it clear that such uses should be located within the network of centres and the Council is satisfied that the centre boundaries defined in the Shopping and Centres SPD (EMP9) provide adequate scope for such uses.

### **Issue 3**

#### **Should the boundaries of the centres referred to in policy TP20 be identified on the Policies Map?**

- 3.1 The boundaries of the 73 centres are contained within the Shopping and Local Centres SPD 2012 (EMP 9) with the exception of the City Centre which is shown on the Proposals Map. The SPD was prepared and adopted just before the publication of the NPPF. However it has subsequently been supported by inspectors at six appeals.
- 3.2 The SPD has therefore proved to be an effective document and it is able to provide clearer and more detailed information in relation to the boundaries of centres and the boundaries of primary and secondary frontages than would be the case on the BDP Policies Map. The Council does not therefore consider that there would be any advantage in including these boundaries on the Policies Map.

### **Issue 4**

#### **a) Should Longbridge be promoted to District Centre and Growth Point status?**

- 4.1 The recent approval of a planning application at Longbridge for a significant amount of new retail floorspace in addition to the new centre at Longbridge proposed through the Longbridge AAP, means that in terms of its size and function Longbridge will be in line with other centres at District status. The Council therefore accepts that Longbridge should be promoted to District Centre status and a main modification to policy TP20 and paragraph 7.28 is proposed to reflect this.
- 4.2 It is noted that St Modwen are arguing that an even greater allocation of comparison retail development should be allocated to Longbridge. The proposals contained in the Longbridge AAP were based on a retail assessment which was tested at the examination into that plan. The recent Marks and Spencer approval has already resulted in a doubling of the amount of permitted retail floorspace compared to the figure specified in the adopted plan. No robust evidence has been presented as to why this figure should be further increased. For these reasons the Council does not consider that this centre should be allocated significant additional comparison retail floorspace to allow it to justify growth point status. It should also be note that the south west of the city already contains one District Centre Growth Point (Selly Oak).

4.3 A more detailed explanation of the background to the issues at Longbridge is set out in the Council's response to Issue 18 of Matter G.

**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 restricted in accordance with 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.

**b) Should Edgbaston Mill and adjoining land be given District Centre status and other areas within the Calthorpe Estate be given Local Centre status?**

4.4 The Council does not support this. It is recognised that there are a mixture of commercial uses at Edgbaston Mill which are loosely related to the Edgbaston Cricket Ground. However these are not closely integrated with one another and are separated by major roads. The Council does not therefore consider that this can be described as a centre. The retail uses present in this location certainly do not justify District Centre status. The other centres within the Calthorpe Estate are small shopping parades, which fall below the categories of centres set out in paragraph 7.22.

**c) Should policy TP20 include a defined centre within the Langley SUE?**

4.5 The need for some additional retail offer has been identified in Policy GA5, and this states that a range of supporting facilities will be included as part of the development which include schools, health care facilities and local shops and

services. Until the masterplanning work for this site is carried out it has not been determined whether these facilities will be grouped into a single location or whether a more dispersed pattern will be more effective at meeting local needs. It is not therefore possible to say at this stage that a new local centre within the definition of policy TP20 will be required.

#### **Issue 5**

**Are policies TP21 and TP 23 positively-prepared and consistent with national policy to promote growth and competitiveness in town centres?**

- 5.1 Policy TP21 fully supports growth and competitiveness in town centres as it states convenience retail will be supported within centres. The Council considers that this policy is important in delivering high quality schemes in centres which will improve their viability and vitality, both of which are important considerations in the NPPF.
- 5.2 Policy TP23 again like TP21 is important in delivering viability and vitality to centres. It promotes a wide range of uses within centres consistent with the NPPF but seeks to ensure that retailing, which is their primary function and which underpins their vitality and viability is not undermined.

#### **Issue 6**

**Should Edgbaston be included in the list of centres with niche roles in the final paragraph of policy TP22.**

- 6.1 It is recognised that all centres are unique, and the centres referred to in the policy are examples and not intended to be prescriptive. However it is not clear what specific niche role it is being suggested that Edgbaston has and so it is not accepted that there is a case for adding it to the examples in the policy.

#### **Issue 7**

**Should policy TP23 contain more detail about the approach taken to the concentration of specific uses in centres, currently set out in the Shopping and Local Centres SPD?**

- 7.1 The policy sets out the key principle that the Council supports and wishes to encourage a diversity of uses in centres. The Council considers that the level of detail set out in the policy on the issue of over-concentration of non-retail uses is sufficient to set out a context for the more detailed local policies set out in the Shopping and Local Centres SPD (EMP9). This approach enables the policies for individual centres to be updated more easily than would be the case if they were included in the BDP

#### **Issue 8**

**Should policy TP23 be more specific about what is meant by community uses and cultural facilities?**

- 8.1 The list of uses promoted in centres through this policy allows for a wide mixture of facilities and functions to be located in centres. It is well-established in the Council's

existing policies that this should include cultural and community facilities. This could potentially include a wide range of uses from religious buildings to health facilities. Given this diversity it is not deemed necessary to list all possible uses that could fall within the cultural and community facilities categories.

#### **Issue 9**

##### **Is policy TP24 fully consistent with national policy towards main town centre uses?**

- 9.1 This policy aims to actively promote Birmingham and encourage tourism in the City and supports tourism and a range of supporting facilities. Tourism in Birmingham is not exclusively based on centres, but the assets contained within the city's network of centres, and particularly the city centre, are important in attracting tourists to the city. At the same time tourism and the expenditure it brings also supports the vitality of centres. For these reasons the Council considers that the policy is consistent with national policy towards town centre uses.

#### **Issue 10**

##### **Should the Plan include a policy about the leisure and evening economy?**

- 10.1 The Council does not consider that a new policy is required on this issue. Policy PG 3 Place Making already addresses some of the planning issues raised by the evening economy including the need to create safe environments that design out crime, and include natural surveillance. However the Council does recognise that the evening economy is an important feature, particularly in the context of the city centre and other large centres and it is accepted that a reference should be included to this. For this reason the Council has proposed a main modification (MM67) which states:

**'The leisure, evening economy is also important and will continue to be supported in suitable centres and in line with the principles established in policy PG3.'**

#### **Issue 11**

##### **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?**

- 11.1 These policies are positively prepared to actively encourage growth in the network of centres and to protect the centres within the hierarchy. The main aim of these policies is to ensure the vitality of centres by clearly demonstrating what is expected and how we will deliver growth in centres. These policies also show where and what type of development is acceptable and the range of uses which will be promoted within the network. The Council therefore considers that they are effectively drafted and justified.