

Mr Ian Kemp
Programme Officer
Birmingham Development Plan 2031 / Examination
49 All Saints Place
Bromsgrove
Worcestershire
B61 0AX

5th September 2014

Dear Mr Kemp

Walmley Cricket & Tennis Club Limited & Birmingham Development Plan 2031

We are writing to you on behalf of our Clients Walmley Cricket & Tennis Club Limited to supplement the submission made to BCC dated 27th February 2014.

The Club was founded in 1886.

It has been located at Eldon Drive, Walmley, for circa 95 years and caters for approaching 500 cricketers, male and female, between the ages of 6 and 60 plus and is very well supported.

This success means that the Club have to play their matches across four grounds in North Birmingham and training is also undertaken in various locations, borrowed on an ad hoc basis.

Given this success story and the Club's growth, the Club's ground has for some years been totally inadequate for their current needs, limited to just 4 acres, having an odd shape and surrounded by existing housing. They have hosted international teams in the past, but their current facilities would now make that impossible.

One further inadequacy of their existing facility is its lack of car parking space, which causes obstruction to neighbouring roads, causes safety issues when there are many children using the ground and causes overspill traffic congestion onto the nearby Penns Lane which is a major thoroughfare.

The Club have attempted to relocate on several occasions to create the much needed additional pitches etc over the last decade or so, the last being a potential move to within the site of the Langley Sustainable Urban Extension(SUE) in 2009 / 2011, but that relocation in the end did not proceed.

The Club has 3 problems:

1. If the Club does not create the necessary additional pitches and other facilities, its future growth and the sustainability of the Club are at risk.
2. To relocate to a new site some distance from the existing ground will threaten and undermine the very existence of the Walmley Cricket & Tennis Club as demonstrated elsewhere with other sports clubs which have moved away and failed. Accordingly the only location where such relocation would be possible is the Langley SUE, and ideally as close to the existing ground as possible, in development block area J.
3. The Club have spent years searching for an alternative site with no success. They have reviewed all potential sites.

Relocation to the Langley SUE is therefore the Club's last and only chance for growth and sustainability. Finding sites for housing is not location sensitive. The Club's requirement is very location sensitive.

The Club would be looking for a site of 8 ha to allow development including 3 full size cricket pitches, cricket pavilion, indoor cricket facility and car park as set out more fully in the submission made to BCC dated 27th February 2014.

Following the submission in February to BCC, officers have subsequently given informal verbal support to the Club's ambition to relocate to the Langley SUE, which is helpful.

However no formal response has been given and the Area C Indicative Land Uses chart attached at Appendix A (which we are advised remain the latest figures available), refers to a green corridor and strategic public open space including "recreation".

The Chart however remains silent upon playing fields and particularly a dedicated and allocated facility for the Club for them to use and share with other local sports clubs as part of their community centred, outward facing approach.

It is true that 75ha of 'open' areas are currently identified within the site but:

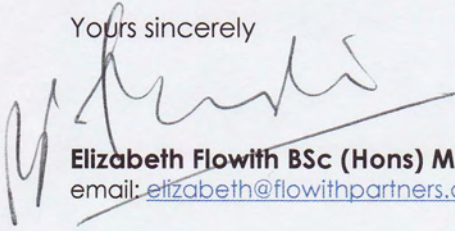
- o None of these open areas are within development block area J which lies closest to their existing ground and would be most suitable
- o None of the 'open' areas currently identified would be physically suitable for cricket pitches being linear strips or uneven sloping ground or affected by environmental factors such as existing tree belts or watercourses
- o Whilst Policy GA5 suggests unspecified playing fields and allotments should also be included within the development, this seems to represent only a "wish list" and is totally inadequate for the specific needs of the Club which needs a single large 8ha site. Such a site is quite clearly not provided for currently.

It is appreciated that such allocation may emerge through the Master Planning process but as this is the Club's last chance, the Club are looking for an absolute commitment at this stage to ensure the Master Planners' brief includes a specific allocation as close to the Club's existing ground as possible, ideally within area J. Without that commitment at this initial stage, it is feared that other competing demands on land may remove the ability to provide such a site and close off the Club's final opportunity to relocate.

Given the extensive support for such new facilities in both NPPF, the BDP and elsewhere, it is clear that without such specific commitment to relocate the Club, the Plan cannot be found sound.

I attach two statements for Matter E (Appendix B) and Matter M (Appendix C).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Elizabeth Flowith', with a long horizontal flourish extending to the right.

Elizabeth Flowith BSc (Hons) MRICS
email: elizabeth@flowithpartners.co.uk

Appendix A

Area C indicative land uses

Land areas (in hectares) are approximate and the sum of land uses is therefore less than the total land area

TOTAL AREA	273
Existing residential*	-12
Existing roads	-5
TOTAL 'DEVELOPABLE' LAND	256

DEVELOPMENT BLOCKS AREA	172
A	9
B	45
C	14
D	14
E	10
F	16
G	14
H	5
J	45

DEVELOPMENT BLOCKS LAND USES

Local POS & play areas, allotments	3
New Secondary School (with pitches)	5
New Primary School x 2	4
Local centre uses & public realm (shops, business, health, pubs, cafes, community buildings, etc)	4
RESIDENTIAL	156 @40d/ha = 6240 dwellings

OTHER LAND OUTSIDE DEVELOPMENT BLOCKS

Green corridor / river other strategic public open space valleys (ecological, landscape, heritage, drainage, recreation and/or movement value) and buffer planting to A38	75
---	----

* Langley Hall (grade 2 listed), Langley Gorse, Langley Heath Farm (grade 2 listed), Fox Hollies (grade 2 listed), Brockhurst Farm, The Oaks (Lindridge Road), Ash Cottage & Yew Trees Cottages (Walmley Ash Road)

Appendix B - Matter E - Walmley Cricket & Tennis Club Limited

Matter E: Green Belt policy, the Langley Sustainable Urban Extension [SUE] allocation and the Peddimore employment allocation (BDP policies TP10 & GA5-6)

Questions

We would wish to comment upon questions 4a and 5.

The NPPF makes it clear that in order to be found sound the Plan must be:

- o **positively prepared** – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements
- o **justified** – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence;
- o **effective** – deliverable over its period and based on effective joint working on cross-boundary strategic priorities;; **and**
- o **consistent with national policy** – able to achieve sustainable development in accordance with the NPPF's policies.

The NPPF confirms (Para 70) planning policies and decisions should plan positively for the provision and use of community facilities such sports venues, and access to opportunities for sport, and recreation (Para 73) can make an important contribution to the health and well-being of communities. So planning policies should be based on up-to-date assessments of the needs for sports and recreation facilities and opportunities for new provision and should identify specific needs.

Development of sports facilities is supported inter alia by Sport England, the England & Wales Cricket Board and the BDP - Policy TP11 (Sports facilities):

“Proposals for new facilities or the expansion and/or enhancement of existing facilities will be supported subject to compliance with other relevant planning policies.”

The BDP at para 6.58 confirms:

“Participation in sport has physical and mental health benefits and promotes community cohesion and the City Council’s approach is to ensure facilities reflect need. The policy focuses on sports facilities that are used directly by members of the public.”

The BDP at para 6.60 confirms:

“The City Council recognises the important role that sport and physical activity facilities have in terms of providing wider health and social benefits.

The BDP at para 6.62 confirms:

“The City Council is endeavouring (with its key partners) to increase the levels of participation and formal sport and informal physical activity within its various assets across the City.”

Notwithstanding the above policy support at both national and local level the BDP remains silent upon this specific identified local and historic need and no commitment to identify a specific allocation as close to the existing ground as possible is given.

As such the Plan is not positively prepared, nor justified, nor consistent with national policy.

The answer to questions 4a and 5 is no.

Remedy

The BDP be required to identify through the Master Planning brief a suitable level single 8ha site, free from environmental and other restrictions within the Langley SUE, and ideally as close to the existing Club ground as possible, in development block area J.

Appendix C - Matter M - Walmley Cricket & Tennis Club Limited

Matter M: The natural and historic environment (BDP policies TP7-9 & TP11-12)

Questions

We would wish to comment upon question 8; *Is policy TP11 consistent with national policy in its approach to protecting sports facilities?*

We consider that whilst Policy TP11 may be consistent with national policy, it is not being followed in Policy GA5 of the BDP.

The BDP - Policy TP11 confirms:

"Proposals for new facilities or the expansion and/or enhancement of existing facilities will be supported subject to compliance with other relevant planning policies."

The NPPF confirms (Para 70) planning policies and decisions should plan positively for the provision and use of community facilities such sports venues, and access to opportunities for sport, and recreation (Para 73) can make an important contribution to the health and well-being of communities. So planning policies should be based on up-to-date assessments of the needs for sports and recreation facilities and opportunities for new provision and should identify specific needs.

Notwithstanding the above policy support at both national and local level the BDP Policy GA5 remains silent upon this specific identified local and historic need for a cricket ground relocation (as explained in both our submission made to BCC dated 27th February 2014 and covering letter dated 5th September 2014) and no commitment to identify a specific allocation as close to the existing ground as possible is given.

As such the Plan is not positively prepared, nor justified, nor consistent with national policy.

Remedy

The BDP be required to identify through the Master Planning brief a suitable level single 8ha site, free from environmental and other restrictions within the Langley SUE, and ideally as close to the existing Club ground as possible, in development block area J.