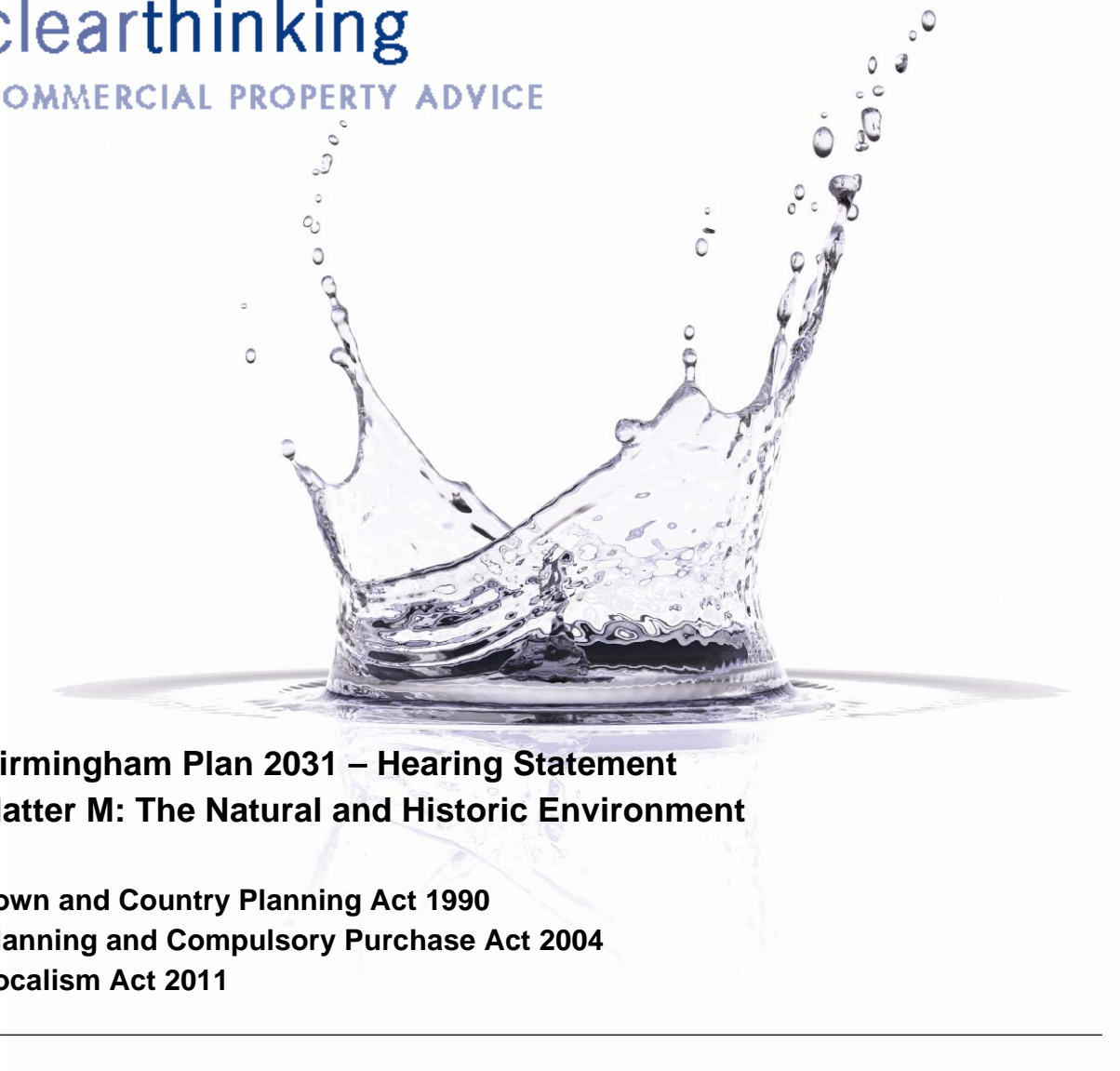


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## **Birmingham Plan 2031 – Hearing Statement Matter M: The Natural and Historic Environment**

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

**On Behalf Of: Bloor Homes Western**

**Prepared By:**

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Job Ref: P1081

Date: 7<sup>th</sup> October 2014

## Birmingham Plan 2031 Hearing Statement

### Matter M: The Natural and Historic Environment

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### **1.0 Matter M: The Natural and Historic Environment**

## **APPENDICES**

## **1.0 Matter M: The Natural and Historic Environment (BDP Policy TP7 – 9 and TP11 – 12)**

*Main issue: Does the Plan contain effective policies to protect and manage the natural and historic environment?*

### **Questions:**

- 1) *Is Policy TP7 justified in requiring refusal of any development proposals that adversely affect the integrity of the Green Infrastructure Network?*
  - 2) *How would a prospective developer know from the Plan whether or not the Development Proposal would affect the integrity of the Green Infrastructure Network?*
  - 3) *Should Policy TP7 also make reference to the “Blue” Infrastructure Network and/or “Emerald Ring”?*
  - 4) (a) *Is the approach of Policy TP8 towards the protection of the natural environment consistent with National policy.*  
  
(b) *Does the policy strike the right balance between compensation/mitigation in allowing development to proceed?*
  - 5) (a) *Is the Policy TP9 justified in the extent to which it relies on a supplementary planning document to define its requirements.*  
  
(b) *Does the Policy strike the right balance between protecting open space and allotments, in facilitating development, including the allowance it makes to developer contributions in lieu of direct provision?*
- 1.1 Policy TP9 largely reflects requirements of Paragraph 47 of the Framework. It places a general presumption against the development of all areas of open space unless:

- 1) There is a surplus open space locally
- 2) The developed area of open space will be replaced by an area of open space of similar quality and size.
- 3) The open space is under used as it has inherent problems. In such cases the development of small areas of open space will be considered if compensation measures are provided.

1.2 This approach departs from the guidance that was set out within the Birmingham Development Planning for Birmingham's Growing Population Options consultation document that:

***“However, there are some opportunities to utilise land currently defined as open space through selective redevelopment which could also provide the opportunity for improving the quality of remaining areas of open space. The North Worcestershire Golf Club is an example where additional housing alongside improving the quality and accessibility of the open space could be delivered” (page 15)***

1.3) The Birmingham Development Plan – Planning for Birmingham's' Growing Population Options consultation document included this reference due to a lack of capacity within the urban area to accommodate new development. It was acknowledged that certain areas of open space are not required, with specific reference to the North Worcestershire Golf Club (NWGC) and are suitable for development to meet housing requirements.

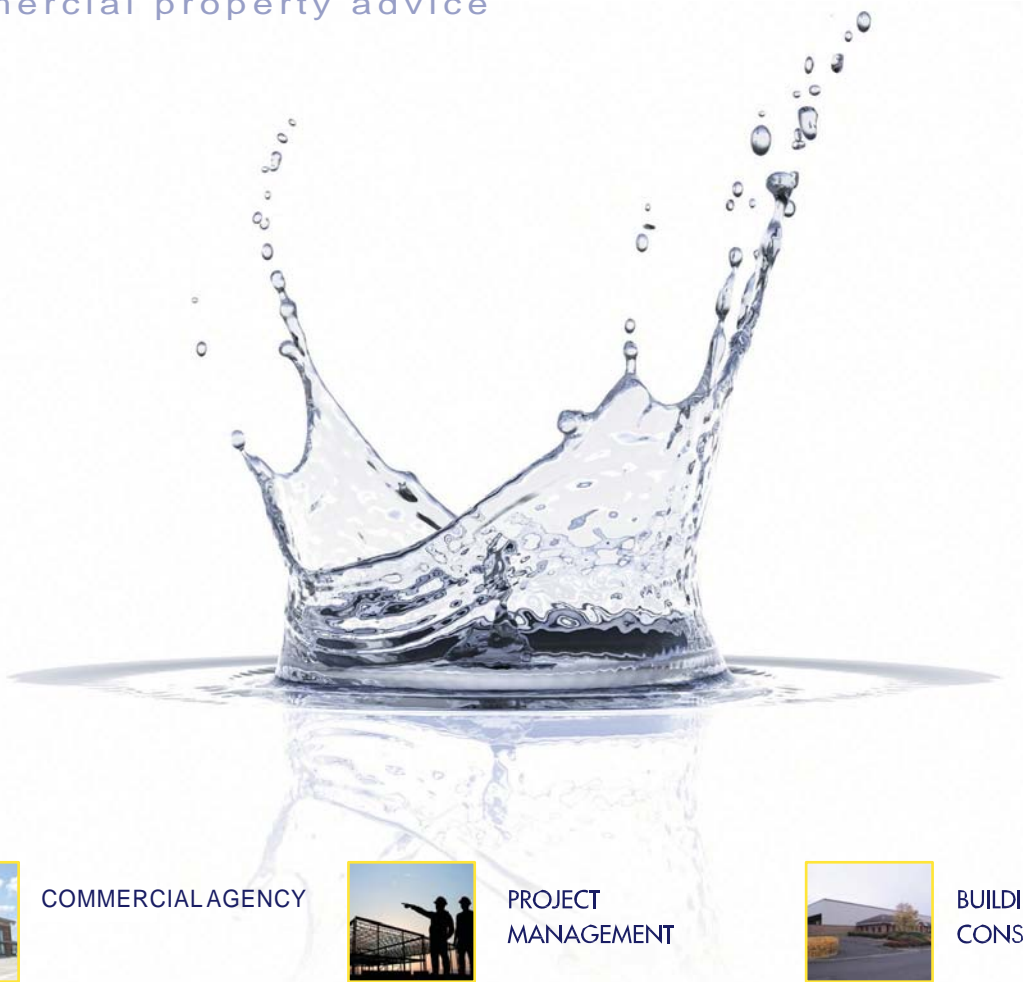
1.4) Due to the limited urban capacity of Birmingham a balance needs to be struck between protecting open space and delivering development. Whilst the three bullet points Paragraph TP9 reflects the requirements of the Framework, they do not reflect the unique situation which Birmingham finds itself in terms of its accepted lack of development capacity.

- 1.5) It is suggested that a fourth bullet point should be added to Policy TP9 that reads;
- The benefits of the proposed development outweigh the adverse impact of the loss of the area of open space. Benefits could include providing housing alongside areas of open space of improved quality, accessibility and usability.
- 1.6) In this regard it should be noted that the NWGC is not identified as an area of open space by the Submission Draft Plan's Policies Map or the Green Infrastructure Network Plan, nor is it identified as open space by the adopted UDP. There is no public right of access to the Club. The development of the site for housing will introduce significant new areas of public open space to the benefit of all alongside much needed housing. The HLPC's statement to Matter E identifies the benefits that will arise as a consequence of the residential led development of the NWGC.
- 7) *Are the requirements of Policy TP9 consistent with the findings of the Council's strategic land availability assessment SHLAA?*
- 8) *Is Policy TP11 consistent with National Policy and its approach in protecting sports facilities?*
- 9) *Should Policy TP11 also protect sports stadiums and other facilities for watching sport?*
- 1.7) We support the recognition in Policy TP11 that it is inappropriate to protect sports facilities where it is shown that they are surplus to requirements through a robust and up to date assessment of need. Whilst it is appropriate to protect sports facilities that are required, if there is no demand for a facility, or the facility is not viable, it should not be protected for its own sake. Given Birmingham City Council's pressing development needs it is more appropriate to redevelop poor quality sports facilities and areas of open space for housing.

- 1.8) In this regard it should be noted that the NWGC is surplus to requirements and not needed for golf purposes. This is demonstrated by the fact the Club has seen significant decline in membership, as detailed in HLPC's Hearing Statement to Matter E, which has resulted in the Club being financially unviable. Furthermore, it has been confirmed by neighbouring golf clubs that they have significant capacity for additional members. The remaining members of the NWGC will have the opportunity to join neighbouring clubs if they so wish.
- 1.9) The impact of the redevelopment of the NWGC on sporting facilities in the City will be minimal. The NWGC is only accessible to its paying members who will have the opportunity to play golf elsewhere. In any event, the Club's financial situation is unsustainable and it will soon close.
- 1.10) The development of the site will result in a significant amount of residential development helping to meet the City's growth requirements. Furthermore, it will create new areas of open space accessible to all resulting in a net sporting benefit as a consequence of the development.

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