

## **Bromsgrove District Council Representations on the Birmingham Plan 2031**

Bromsgrove District Council (BDC) would like to echo the comments made by Birmingham City Council (BCC) in response to the Bromsgrove District Plan. The Council agrees that collaboration between the authorities has been both intense and fruitful, particularly on the preparation of the Longbridge Area Action plan, and more recently in connection to the establishing and development of the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP).

The Council in general supports the policies of the Birmingham Plan 2031 and would commend BCC on a making such a succinct plan which covers such a vast array of planning issues. BDC does have some concerns on a number on specific elements and would welcome the opportunity to continue to engage with the city council in progressing towards a successful planning outcome which maximises the benefits to both authority areas.

### **Page 28 - Policy PG1 Overall levels of growth.**

The Council acknowledges the levels of growth required for the future needs of the City and understand this represents a problem for BCC in plan making terms. BDC would urge BCC to maximise and commit to, via the granting of planning permission to the use of all available land within the city before options for growth elsewhere are considered. We welcome the references at para 5.9 and other areas within the plan that the focus for growth will be on re using existing urban land through regeneration, this intention is fully supported by BDC.

BDC is committed to working with BCC under the duty to cooperate and within the context of the GBSLEP and other studies that have been commissioned, to establish if any of the additional development the city requires can be provided for sustainably in and around settlements across north Worcestershire or beyond. Whilst acknowledging this plan is only for the City Council area, BDC questions why the additional development of around 33,000 houses is not mentioned specifically in this policy. BDC considers that to give it the status it should have in the context of the overall levels of growth BCC is suggesting it requires, this policy should make explicit reference to it, and the fact that it may need to be provided in other local planning authority areas. This feature of the plan where this additional growth remains consistently understated throughout gives BDC some concerns over the overall deliverability of the Birmingham Plan and also means the council is unsure of any future the implications for the Bromsgrove Plan which is shortly to be submitted to the Secretary of State. It should be noted that BDC have included a policy (BDP Policy 4 - Green Belt) in the Bromsgrove Plan to allow for some of the future development needs of the conurbation to be met in Bromsgrove should the evidence suggest so.

## **Page 45 - Policy GA5 Langley Sustainable Urban Extension**

BDC welcomes the inclusion of a major new residential site to help accommodate the needs of the city

BDC acknowledge that work has been undertaken to establish the most sustainable option for expansion of the City within the confines of the City Council area. The Council would urge against the assumption that Sustainable Urban Extensions (SUE) are the best approach for delivering growth in other areas adjacent to the city. A range of options to deliver growth needs to be considered in detail, in all scales and in all potential locations for growth. It is hoped the GBSLEP housing study will begin this process and BDC once again reaffirm commitment to progressing this study in line with the published brief.

The evidence prepared to support this allocation does give cause for concern. The report prepared on behalf of the City Council suggests that only 5000 houses will be able to come forward over the plan period in this area, the allocation in GA5 is for 6000 houses. This element of overprovision and flexibility is welcomed, although clarity on the implications for overall housing supply if the BCC commissioned report is correct and only 5000 is delivered would be welcomed. In addition to the report prepared on behalf of the BCC, BDC is aware of a report prepared by Savills on behalf of house builders / developers which also looks at this area. This report concludes that delivery could be significantly higher in the range of 9360 - 11700 conservatively, and even as high as 15600 certain circumstances allow.

BDC would question why 6000 has been allocated in the Green Belt, when BCC evidence only suggests 5000 is deliverable. Particularly as other evidence produced by the house building sector suggest a much larger number in the region of up to 15600 could be delivered. Whilst BDC forms no view on the accuracy of one study over another, clearly as such a large range of housing delivery exists, there is a significant different of opinion which clearly needs to be explored further, and if necessary changes to the allocations made to allow for more development in this area.

With this in mind BDC would request that more flexibility is added to the BDP so that any divergence away from the claimed delivery rates in the BCC study can be accommodated on other land within the BCC green belt.

BDC requests that BCC allocate more of the land identified in the Birmingham Green Belt options assessment in addition to the Langley SUE. This land could be taken out of the green belt and safeguarded for future development need. Should progress on developing out the SUE diverge from the expected rate identified by the BCC study, this land could be released in order to provide additional sites should the market allow for it. Or if issues arise which are particular to the Langley site which is preventing it coming forward at the desired rate, this additional allocation could be brought on stream to pick up the under delivery . This would not only demonstrate

Birmingham’s commitment to meeting its own housing needs within the city, but would also introduce the much needed flexibility the plan is required to have in accordance with para 14, 153, of the NPPF.

**Page 64 - Policy GA10 Longbridge**

BDC supports the inclusion of the Longbridge site as an important development location, and remains committed to bring it forward over the coming years in line with the policies in the adopted Area Action Plan (AAP).

BDC would like to stress that Development at Longbridge needs to remain in accordance with the proposals in the AAP unless material considerations indicate otherwise. As BCC are aware the plan went through significant stages in its production to ensure that the mix of development on site would not only regenerate the local area, but also compliment other surrounding locations ensuring their continued viability and vitality, particularly those close by in Rubery and Bromsgrove. Should development move away from that which is planned, and particularly if retail uses become more prominent then there is a serious risk that development at Longbridge could undermine the success or regeneration of other areas both in and outside the City. BDC is aware and understand though its continued engagement with BCC over Longbridge that flexibility is required in the context of some of the AAP policies, as has been demonstrated by a number of the schemes which have been granted permission, and in some case completed at Longbridge.

Of particular concern are what appears to be the current aspirations of the developers to move away from an employment and housing led regeneration scheme, to more of a housing and retail led scheme.

New retail proposals over and above agreed levels should be refused. They do not present a more traditional and sustainable town centre with a mix of outlets providing a range of goods and prices. This type of centre was envisaged as part of the regenerating a new sustainable community for Longbridge. The scale and type of comparison retail floor space currently being proposed are significantly in excess of the policies in the AAP, with little or no real justification as to their suitability, and certainly not as the developers claim in conformity with the AAP. The table below shows in simple terms the levels of over provision against the AAP targets.

	AAP requirements	Permissions granted	Further Proposed	Total proposed development	Overprovision compared to AAP	Total % Overprovision
Convenience	7500 m <sup>2</sup>	8192 m <sup>2</sup>		8192 m <sup>2</sup>	692 m <sup>2</sup>	9.2%
Comparison	6000 m <sup>2</sup>	6800 m <sup>2</sup>	13935 m <sup>2</sup>	20735 m <sup>2</sup>	14735 m <sup>2</sup>	245%
Total	13500 m <sup>2</sup>	14992 m <sup>2</sup>		28927 m <sup>2</sup>	15427 m <sup>2</sup>	114%

If this scale and type of retail floorspace is deemed acceptable particularly in the form of the current proposals it would represent a vast over provision of retail, doing little to create a new centre in either built form or as a vibrant and viable town centre. These proposals create an out of town/destinational shopping centre which does very little to support the local economy and harms surrounding centres by drawing excessive trade from them. BDC would request that BCC commit the policies of the AAP and ensure that the focus for Longbridge remains on creating a sustainable mixed use location where 10000 jobs are created and not one that is dominated by large floor space comparison retailers. As a bare minimum more detail should be provided in the form of a full retail impact assessment and sequential test to at least attempt to justify the scheme.

BDC note the inclusion of the housing capacity at Longbridge counting towards development needs of Birmingham. We would expect the residential element of this development including the east works in Bromsgrove to be completed before consideration is given to any greenfield development in or around this location.

### **Page 92 - Policy TP16 Portfolio of employment land and premises**

BDC supports maintaining an employment land portfolio including Regional investment Sites (RIS) including the one as part of the Longbridge AAP. BDC acknowledge the strong employment links between the two districts which we would look the further strengthen with the ongoing involvement of the GBSLEP.

### **Page 109 - Policy TP27 The location of new housing**

The policy requires that housing development should not conflict with policies for protection of Core Employment, Open Spaces, and Green Belt. No assessment has been carried out of adjoining districts to see if any development in these areas will also be able to meet with this criteria. These objectives should be carried forward when consideration is given to accommodating Birmingham's additional growth needs.

#### **Para 8.10**

BDC believe this paragraph is incorrect and misleading, the claim that over 80% of all the new homes during the plan period will be built on previously developed land cannot be correct when the location of 39% of the city's future housing requirement remains unresolved. Whilst it is assumed that this paragraph is referring to the development within the city boundaries, the reference '*80% of all the new homes to be built over the plan period*' would also mean the as yet unaccounted for additional growth. This paragraph should be amended to represent the position more clearly.

### **Page 110 - Policy TP28 the housing trajectory**

The evidence shows that more than 1,000 vacant properties have been bought back into effective use in the past 5 years, however this does not necessarily mean it is appropriate to include this figure in land supply calculations. The South Worcestershire Authorities proposed to add 550 dwellings to their supply to account for long term vacant properties coming back into effective use, this was not supported by the South Worcestershire Development Plan Examination in Public Inspector. BDC welcomes the bringing of empty properties into use and supports the ongoing effort made by the various schemes the City Council is involved in to rejuvenate the housing stock within the city, including the policy proposals in TP34, but would question how robust the housing trajectory is with this element included.

Point of note is that the trajectory within the proposed submission plan does not tally with table 3 on page 6 of the 2012 SHLAA. The SHLAA highlights that the amount of development in the period beyond year 10 is expected to be lower than the period of years 6-10, whereas the trajectory suggests that completions will continue to rise throughout the plan period. It must therefore be assumed that the Green Belt release around Sutton Coldfield is planned for the later part of the plan period, clarification on this point would be welcomed.

### **Page 122 – Policy TP37 A sustainable transport network**

The City clearly has growth aspirations as an international City. Required to support this and also many of the aspirations of the GBSLEP is the need to connect people and places. To do this a sustainable transport network which operates across the region and beyond is essential. BDC supports the intention of the City to continue to improve all modes of transport and connectivity, and would request the continual support of BCC in extending key corridors such as the electrified cross city line into Bromsgrove Town. BDC would also stress that many of the road transport links which are vital to the cities continued success extend into the surrounding districts. This fact must not be overlooked when investing on upgrades to key routes. Continual discussion between the relevant authorities both within the city and outside is needed to take place to ensure the correct investment decisions are made to link the city to the wider network beyond. BDC are happy to instigate these discussions if proposals for upgrades routes which enter the district are brought forward.

### **Duty to Cooperate Statement Page 6 Bromsgrove**

BDC support the statement in connection with Bromsgrove, although would like a few minor changes made which are shown on the version reproduced below. BDC feels these changes would represent a more accurate picture of the level of cooperation between the authorities. If these are changes that BCC does not feel it is able to make we would welcome the opportunity to discuss them further.

Additions to text in Blue underlined

Deletions to text in ~~Red Strikethrough~~

Local Authority	Meeting(s) held	Current Position
Bromsgrove	<ul style="list-style-type: none"> <li>* Bi-lateral meetings held</li> <li>* GBSLEP Planning Group and Spatial Planning Group</li> <li>* Steering group meetings for the GBSLEP Strategic Housing Needs Study</li> <li>* Meeting of Worcestershire Planning Officers Group</li> </ul>	<p>Bromsgrove have expressed concerns over the possibility of some of Birmingham’s housing requirement being satisfied outside the City boundary.</p> <p>Bromsgrove is part of the GSLEP and will be covered by the GBSLEP Housing Needs Study which will <u>begin to</u> address this issue.</p> <p>The City Council <del>has</del> requested <u>that</u> Bromsgrove <del>to</del> include in their emerging <u>District Local</u> Plan a commitment to an early review, in the event that it is concluded that provision to help meet Birmingham’s needs should be made in Bromsgrove. <u>This request has been met by Bromsgrove</u></p> <p>Further discussions may need to take place in the context of Bromsgrove’s Pre-submission Plan which has just been published.</p>

**Duty to Cooperate Statement Page 8-9 Redditch**

BDC do not feel that the statement as it stands represents the issues surrounding Redditch correctly. We have suggested changes below which again we feel represents the picture more accurately. We understand that Redditch Borough Council (RBC) agree with the statement as it is currently written by BCC, although in BDCs view this does not mirror the statement on page 5 of the Borough of Redditch Local Plan No.4 Proposed Submission (September 2013). We would wish to work with both BCC and RBC to rectify this issue, and ensure consistency is reached on the duty to cooperate and its implications for plan making.

Additions to text in Blue underlined

Deletions to text in ~~Red Strikethrough~~

Local Authority	Meeting(s) held	Current Position
Redditch	<ul style="list-style-type: none"> <li>* Bi-lateral meetings held</li> <li>* GBSLEP Planning Group and Spatial Planning Group</li> </ul>	<p>No representations made to date on the Birmingham Development Plan</p> <p><del>There is a shortage of land within Redditch to meet housing needs arising within Redditch due to its tightly drawn boundary and therefore no potential for it to contribute to meeting Birmingham's needs.</del> An exchange of correspondence <a href="#">on the Birmingham growth issue</a> has led to an agreed wording <del>on this issue</del> for inclusion in the Redditch Local Plan No 4. The Pre-submission version of this plan has just been published.</p> <p>The <a href="#">options for the future distribution of housing across the Birmingham housing market which includes Redditch area</a> will be covered by the GBSLEP Housing Needs Study.</p>