

“The Greater Birmingham and Solihull LEP Strategic Spatial Plan for Recovery and Growth”

Consultation response by the West Midlands Futures Network

Introduction

The Futures Network West Midlands (FNWM) comprises individuals from professional and academic backgrounds who have experience of and commitment to strategic and spatial planning with a particular interest in the West Midlands. Its purpose is to provide a voluntary independent network with the aim of opening up and examining key long term issues and potential futures facing the West Midlands.

This current consultation response to the GBSLEP Strategic Spatial Plan has been developed by an FNWM group of professional planners previously engaged over many years in similar strategic planning exercises in the West Midlands.

The response has been endorsed by the FNWM Steering Group.

An overview of the GBSLEP Spatial Plan

FNWM fully supports the development of a spatial planning framework for the LEP area and very much welcomes the open process adopted of directly involving differing sectors in its formulation.

It also supports the innovative approach adopted in examining drivers for change, shaping alternative scenarios and developing a conceptual framework for a common policy base for the LEP area.

However, despite some attempt to take into account the inter-relationships with surrounding LEP areas at this early stage in the formulation of a spatial plan, the process has exposed some serious limitations.

In particular, the limited geography of the plan area is inappropriate for properly assessing many of the strategic issues that need to be addressed e.g. journey to work and housing and labour market areas extend across a much wider city-region.

In establishing the Single Local Growth Fund, the Treasury has made it clear that it expects LEPs to adopt “a co-ordinated approach to spatial planning”. It is the view of FNWM that, in this case, this principle should be applied at both a conurbation and city-region level and improved arrangements should therefore be established for joint working and liaison with adjoining local authorities and LEPs.

This wider geographical perspective should particularly be applied in the identification and evaluation of potential spatial options - an exercise still to be undertaken with regard to the distribution of the identified housing shortfall (*), the

possible identification of further strategic employment sites and the establishment of inter-related transport policies and priorities.

(*note – the housing figures of 50,000- 60,000 dwellings has yet to be tested and are not necessarily endorsed by FNWM at this stage).

In particular, the inter-relationship between spatial planning options and transport policies and priorities will need to be a key consideration and this can only properly be examined on a wider geographical basis i.e. by incorporating other surrounding LEP areas..

Shaping the Spatial Plan – Drivers of Change

Whilst FNWM generally supports the Drivers of Change identified in the consultation draft, it would suggest that there are also further dimensions that should be acknowledged with implications for the principles underpinning the plan.

Over the past 12 months, FNWM has held a series of seminars examining the implications for the West Midlands of demographic change based on the analysis of Census material. One of the key themes identified within this process has been an increasing distinction between rich and poor areas and the social structures associated with this (i.e. sometimes termed social polarisation). If this trend continues, it could have a serious outcome for the West Midlands. The risk is that an over emphasis on short term economic opportunism could lead to a “two speed region” with even greater contrasts between rich and poor areas ‘locking in’ longer term decline and dis-investment in some localities. This will lead to unsustainable patterns of development and the under-use of existing infrastructure and brownfield land, along with potential implications for social inclusion and cohesion.

There is therefore a need to recognise that the strong forces of decentralisation of investment associated with the selective dispersal of population and economic activities will continue to act as a significant driver of change.

Recognising this is particularly important as FNWM believes that this underlying driver of change needs to be properly addressed and managed and that this should be a key concern of the Spatial Plan

This will not only require an appropriate balance of development opportunities - including the creation of new opportunities in areas of decline – but also a long term commitment to maintaining and improving the ‘quality of place’ across all parts of the major urban areas to ensure that their economic and social potential is realised.

Whilst ‘quality of life’ is identified as driver for change, it is therefore recommended that ‘quality of place’ should also be included to ensure that this key influence on future investment and the long term economic success of urban areas is fully acknowledged.

Shaping the Spatial Plan – Principles

FNWM has a number of detailed comments on the list of principles already identified as set out in the attached Appendix 1. However, following from the above review of the ‘drivers of change’, **it would also strongly recommend that Urban Growth and Renewal should be clearly identified as a separate important further headline principle within this list.**

There are likely to be enormous economic and social costs of failing to regenerate the major urban areas and it is vital that the West Midlands maintains this long term continuing commitment. This will require a balanced and managed approach to growth harnessing economic potential and opportunities across all areas of the West Midlands not just those driven by short-term market interests.

It is noted that a recent Inspector’s report into the Solihull Local Plan has concluded that “the revocation of the WMRSS does not render the urban renaissance strategy defunct” and that it “continues to be relevant and significant in the planning of the sub-region”.

Shaping the Spatial Plan – Policies

FNWM has a number of detailed points on the policies and these are set out in the attached Appendix 2.

Particular overarching concerns are as follow

- a. SP1 and SP2 - in providing a portfolio of employment sites, it will be important to ensure that this is complementary to similar portfolios of other surrounding LEPs, particularly with regard to the provision of strategic sites;
- b. SP7 – a balance needs to be struck between realising opportunities in areas with immediate short-term market potential and enhancing growth opportunities in or close to areas in need of regeneration;
- c. SP10 – in considering future housing land supply, the full capacity of windfall sites and potential new opportunities (e.g. resulting from market changes in retailing - see below) should be taken into account; it will be critical to ensure that land supply delivers a mix of housing types, tenures and costs across all areas not just the provision of private ownership in areas attractive to the market
- d. SP12 and SP13 – all authorities in the West Midlands should liaise both on housing evidence and policies for future land supply given the over-lapping nature of housing market areas; in particular, the potential use of surplus brownfield land in the Black Country should be fully taken into account in looking to meet the housing needs of the BSLEP area along with other opportunities in areas beyond the LEP boundary (e.g. Telford)
- e. SP17 – reviews of Green Belt in Local Plans should only be contemplated if, first, the development potential within urban areas has been fully examined and exploited and if, second, it can be demonstrated that selected locations are the most sustainable option with regard to environmental and transport considerations

Shaping the Spatial Plan – Options

It is clear that, at this stage, the critical part of the Spatial Plan has yet to be completed i.e. formulating the scale and balance of development across the LEP area and the inter-relationship with similar proposals in adjoining LEP areas.

The options identified in the consultation document set out the broad advantages and disadvantages of a range of choices and consultees are invited to set out views on which options are preferred for accommodating future growth

In responding to this request, FNWM would recommend that, rather than adopting a 'pick and mix' approach, **a sequential methodology** should be taken to this choice process. This should initially work out from Option 1 – Urban Consolidation as the most sustainable long-term option but should then build on future transport policies and priorities across the wider city-region in order to guide the identification of further locations for strategic growth.

With regard to Urban Consolidation, it is now more than evident that current changes in retailing are leading to a contraction of demand for space in and around many centres. This is opening up new opportunities for higher density mixed use redevelopments which could significantly increase housing capacity particularly, although not exclusively, within the major urban areas

Realising this urban growth potential will, however, require further supporting investment particularly in public transport to ensure that accessibility in such areas is maintained and market confidence is enhanced. A comparison with other UK and European cities demonstrates that the Birmingham conurbation is falling far short in such investment with serious long term economic consequences..

In this context, FNWM would strongly advocate that further close working is required with the Black Country LEP to explore whether, through appropriate further investment in transport and land restoration, there is space and economic potential to accommodate significantly greater growth within the urban area. FNWM believes that this should be investigated further before commitments are made to substantial opportunistic greenfield developments particularly those that may draw investment away from areas of need and the existing business and housing stock.

Transport - including HS2

'International connectivity' is already included as a key principle for shaping the Spatial Plan but it is clear that national, regional and, indeed, local connectivity will be equally important in this process. One of the greatest challenges will be improving the transport network to accommodate growth, to manage congestion and to promote sustainable modes of travel across the West Midlands. There is already a long standing and continuing commitment to a series of schemes and measures going back to the Regional Transport Priorities Action Plan (Dec. 2008) which includes Metro, rail and bus improvements and the continued failure to deliver these would be a serious threat to any strategy.

Moreover, in the longer term, there is a need to consider the implications of HS2 and how this significant investment can benefit the economic regeneration of the West Midlands as a whole - not just those areas immediately around stations.

In a recent FNWM initiated seminar at Birmingham University, the key note speaker Sir Peter Hall demonstrated how improving intra-regional connectivity to the HS2 network will be critical if benefits are to be spread in this way. It is understood that work has already been undertaken on updating the key improvements to the West Midlands transport network to achieve this connectivity. However, if this is to be used to influence the future distribution of development, FNWM believes it will be essential to determine first the relative priority of different components within this.

This should particularly include projects necessary in their own right but which would also deliver the additional benefits promised by HS2 immediately upon its completion (i.e. transport priorities not solely predicated upon but complementary to HS2).

Conclusion

FNWM fully supports the development of the Spatial Plan for Recovery and Growth as an innovative approach to addressing strategic planning issues and for helping to fulfil the Duty to Cooperate (i.e. in the absence of any prescribed mechanisms).

By underpinning the emerging GBSLEP Strategic Economic Plan, it clearly demonstrates that effective strategic planning has a key role to play in economic recovery, as well as drawing in wider environmental and social considerations as required by the National Planning Policy Framework.

As the recently published Treasury Command Paper "Investing in Britain's Future" (June 2013) emphasizes, a coordinated approach to strategic planning is necessary to secure monies from the Single Local Growth Fund.

Moreover, in the absence of such a plan, the inevitable consequence could well be a 'free for all' of planning applications not only wasting resources but also resulting in uncoordinated, unsustainable development.

For all these reasons, despite the constraints identified in this response, FNWM urges the LEP to press ahead with this task as rapidly as possible in order to establish a development framework for the LEP area in order to guide proposals for the broad location and scale of growth along with related transport policies and proposals.

Appendix 1

Question 1: Drivers of Change – ranked in order of importance

- 1st Population change
- 2nd Quality of life
- 3rd Population growth
- 4th Creating a place to do business
- 5th Civic and business leadership
- 6th Innovation
- 7th Climate change
- 8th Public policy and opinion
- 9th Globalisation of trade
- 10th GBSLEP centrality
- 11th Land scarcity
- 12th Regulation

Comments

- a) 'Decentralisation of Investment' should also be recognised as a key 'driver of change' and should be included towards the top of the above list
- b) In addressing quality of life, there is a need for a strong focus on creating/maintaining distinct 'quality of place'
- c) The most serious aspect of population change to be addressed is the danger of social and spatial polarisation
- d) A strong civic and business leadership will be characterised by positive cross-LEP boundary working in order to address wider issues

Question 2: Key principles of the emerging spatial plan

Degree of support for 14 principles with comments invited
[Very High (VH); High (H); Medium (M); Low (L); Very Low (VL); N/A]

- (1) Alignment (H)
- (2) Sustainability (VH: essential for proper planning)
- (3) Objectivity (H)
- (4) Longevity (H)
- (5) Inclusivity (VH: support "strong social & environmental justice")
- (6) Consensus (VH: "identifying sustainable locations beyond conurbation")
- (7) Global Connectivity (H)
- (8) Diversity (H)
- (9) Existing Opportunities (VH: "maximum use of existing infrastructure")
- (10) Recycling of land (VH: "prioritising the recycling of land/property")
- (11) Environmental Impact (VH: essential for proper planning)
- (12) Context (H)

(13) Evolution (H)

(14) Cross-LEP working (VH: enable wider impacts to be addressed)

Comments

- a) 'Urban growth and renewal' should also be included in this list of principles and given a VH level of support (see main comments).

Question 3: Strategic Objectives

Strategic Objectives (degree of support and comments invited)

All the objectives are agreed (H) but the following are more strongly supported (VH)

Objectives 2, 5, 8, 11, 13, 14, 17, 21, 24, 25, 38, and 39

Appendix 2

Do you support the strategic policies we have identified to meet the economic, social and environmental needs of the GBSLEP?

SP1: The provision of a portfolio of sites and premises providing a choice of development and investment opportunities within the GBSLEP

Comment : *Should prioritise brown field sites for larger sites. Needs to be regional or at least conurbation wide*

SP2: To identify strategic employment locations to ensure major investments can be accommodated within the GBSLEP

Comment : *This should not just be based on LEP boundary. Need to acknowledge opportunities for other limited sites across the wider West Midlands. Need to avoid too few or too many half-empty or badly located sites. This needs to prioritise brown field sites e.g. Longbridge, i54*

SP3: Ensure a business-friendly planning service is provided throughout the GBSLEP through implementation of the planning charter

Comment : *Agree - provided planning engages all parties and carries respect across the board.*

SP4: Enable recycling of unused or under-used employment land including alternative uses where it can be demonstrated the land is genuinely surplus and falls outside core employment areas

Comment : *Agree - but the assessment methodology for land which is surplus to requirements must be robust as there is a need to ensure sufficient available employment land - some with lower land values*

SP5: Invest in the fabric of existing employment areas so they remain attractive as investment locations

Comment : *Agree – this should include green Infrastructure and transport investment*

SP6: Support the growth of an innovation eco-system through support for science parks, innovation centres, incubators and commercialisation of university research and expertise

Comment : *Strongly agree - innovation should be fully supported*

SP7: Target growth in spatial areas with greatest potential including the Enterprise Belt with the M42 gateway at its heart

Comment : *Care needs to be taken to ensure that a balance is achieved between using areas of potential and ensuring development supports regeneration across the board. It is unclear exactly what the Enterprise Belt comprises and there will be a need to demonstrate exceptional circumstances if green belt is to be used.*

SP9: To facilitate growth through the use of Local Development Orders and the Enterprise Zones in Birmingham and Kidderminster

Comment : *Agree*

SP10: Local authorities and developers should work together to deliver housing of a range and type to match needs identified in the evidence base – including both market and affordable housing

Comment : *The evidence base will be tested, particularly through the Birmingham Plan. The Spatial Plan is not yet tested so should not be used to promote specific figures at this stage. This is particularly important given the role of the LEPs in the NPPF.*

There is a need for a mix of housing types coming forward and it is important that house building priorities support urban regeneration and rural renaissance. Capacity from windfall sites should be included.

SP11: To ensure a 5 year supply of deliverable housing sites is maintained.

Comment : *The NPPF requires a 5 year land supply and it is important that this is maintained within a plan led system.*

SP12: Local authorities within the GBSLEP to work together with their neighbours to produce and keep up-to-date the housing market evidence base

Comment : *There is a need to involve neighbouring LEPs in this exercise. The provision of brown field sites in adjoining areas (such as the Black Country) needs to be fully exploited as well as opportunities in other areas (e.g. Telford).*

SP13: Local authorities to work together in a collaborative way, in consultation with the private sector, to ensure that the wider needs of the housing market are properly addressed under the duty to co-operate

Comment : *The duty to co-operate is far from perfect but should be used to ensure sensible*

cross-boundary planning but not over-ride local decision making. Consultation with the private sector is essential but third sector parties concerned with the environment and social issues should also be included.

SP14: To develop policies and strategies to maintain and improve the existing housing stock

Comment : *This is strongly supported. The issue of the increase in housing in the private rented sector, which is not properly maintained, needs addressing. This also needs to take account of heritage.*

SP15: In assessing the potential capacity for housing on previously used land realistic assumptions should be made which promote and protect jobs as well as retain land for other uses

Comment : *Capacity for housing on brownfield land should reflect need for both housing and employment land with robust methods for assessing the future use of employment land*

SP16: Settlement strategies in development plans should reflect and encourage sustainable transport modes and recognise critical environmental constraints

Comment : *The strategies should first promote sustainable transport by focussing development within major settlements and, if that is not enough, then at appropriate accessible locations on the edge taking account of environmental constraints.*

SP17: Subject to the outcome of collaborative working under the duty to cooperate local authorities should develop a positive strategy for releasing development land and, where necessary carry out a review of green belt

Comment : *A review of green belt may be required but the Government reiterated In July 2013 that housing numbers do not on their own represent 'exceptional circumstances' for release of green belt.*

SP18: Promote/deliver regeneration and renewal across urban and fringe locations

Comment : *The delivery of regeneration in urban areas is strongly supported. Fringe sites should be considered only if there is insufficient urban land and they represent the most sustainable option, taking account of environmental constraints and transport opportunities. Fringe sites should be developed in a holistic way.*

SP19: To support the preparation of neighbourhood plans to bring forward proposals for growth across all areas of the GBSLEP

Comment : *Neighbourhood Planning should be supported and, where appropriate, neighbourhood development proposals.*

SP20: To support the preparation of Town Centre enhancement and improvement programmes

Comment : *This should be strongly promoted working closely with neighbouring authorities such as the Black Country to deal with retail in a holistic way. The potential for mixed use redevelopments (incorporating significant new housing opportunities) should be fully recognised and exploited given the reduced demand for retail space*

SP21: Develop Birmingham city centre in line with the aspirations of the Big City Plan

Comment : *The development of Birmingham is supported provided it is balanced with the development of other town/city centres in the LEP and adjoining areas.*

SP22: Develop an initiative for a pilot biodiversity offsetting scheme across the GBSLEP

Comment : *This should be supported.*

SP23: To create attractive and desirable places through good design and sustainable construction to reduce consumption of resources

Comment : *'Quality of place' will be critical to the future long term economic prospects of the urban areas; this policy is therefore fully supported but also needs to take account of heritage assets*

SP24: Champion a catchment approach to flood risk management and water quality objectives

Comment : *This is supported linked to an overall improvement to the environment around waterways as amenity and landscape/biodiversity assets*

SP25: Champion the development of the Birmingham and Black Country Nature Improvement Area

Comment : *This is fully supported*

SP26: Ensure active engagement with green and blue infrastructure opportunities (including access to green space and exercise)

Comment : *This is critical particularly in collaboration with initiatives in neighbouring areas, for example, the Black Country Park concept*

SP27: Deliver enhanced economic and social value and benefits of environmental and community infrastructure (green and blue)

Comment : *Agree provided it is understood that we should invest in environmental assets primarily for their intrinsic value.*

SP28: Protect and improve air quality and water quality

Comment : *Agree - this should include addressing the source of pollution e.g. traffic and industrial processes.*

SP29: Development of a network of trails to encourage cycling and walking across the GBSLEP linking communities with places of interest and work

Comment : *Agree - this is crucial for developing an increase in sustainable travel but segregation should not necessarily be used to keep cyclists and pedestrians away from cars i.e. there is also the need to include the development of shared space. Should include sensible control of traffic speed, especially residential streets, in villages and on rural roads where most crashes occur.*

SP31: Keep under review the extent and value of contaminated land and its potential for remediation

Comment : *Agree - there needs to be supporting financial policies to ensure remediation can occur.*

SP32: Enhance the natural capital of the GBSLEP's environmental assets including a significant increase of woodland coverage

Comment : *Agree - an increase in woodland coverage is desirable, while protecting open views where they enhance the landscape*

SP33: Encourage local food production areas (including specialities) and associated food processing

Comment : *Agree. This should include a presumption to protect the best and most versatile land from development.*

SP34: Deliver a significant increase in the generation of energy from renewable sources within the GBSLEP including community ownership

Comment . : *There is a need for renewable energy provided it is sympathetically located. There should be support for neighbourhood heating projects and energy efficiency improvements to existing buildings (taking account of heritage interests)*

SP35: Facilitate and promote digital connectivity

Comment : *Agree - particularly in more poorly served rural areas.*

SP36: Promote smart cities and manage the transport network efficiently

Comment *The transport network should be managed efficiently but not at the expense of promoting alternatives to car travel.*

SP36: Capitalise on development of High Speed 2 (HS2) with a package of measures improving connectivity across the GBSLEP area

Comment : *Agree but most of the improvements local to rail, bus and metro services being promoted by CENTRO have been in the pipeline for up to twenty years and we need to see them developed whether or not HS2 happens, and, in most cases, before it goes ahead.*

SP37: Encourage access to labour and skills by provision of key infrastructure linkages to link areas of need with areas of opportunity

Comment : *Linking areas of need to opportunity is desirable but should not be used as an alternative to also investing and creating opportunities in areas of need. If done badly it could add to congestion.*

SP38: Encourage public transport use and local connectivity in all modes by investment in quality and quantity

Comment : *Agree - we strongly support improvements to public transport quality such as the proposed Sprint Bus network.*

SP39: Enhance and protect rail-freight capability

Comment : *Agree - we strongly support the need for further investment in rail freight. There is a need for a variety of freight depots, including smaller depots Across the conurbation.*

SP40: Improve and create cycling and walking links and trails and promote green connectivity

Comment : *This is supported but should not be based primarily on segregation. There needs to be a step-change in priority for cycling and walking on the road network with lessons learnt from other European countries*

SP41: Enable the M6 Toll for effective use by through traffic – especially freight traffic

Comment *There is likely to be no case for buying the M6 Toll from MEL to reduce the tolls. The cost would be high and the impact on congestion small and short lived. Public money would be better spent on public transport investment. However, MEL should be encouraged to reduce the toll on lorries which are under-represented on the toll road and could improve the efficiency of the M6 if transferred to the M6 toll.*

SP42: Maintain and enhance quality of road network

Comment : *Maintenance of the roads, particularly pot hole management should be prioritised.*

SP43: Develop a Midlands 'Oyster' scheme to facilitate easy interchange between services and modes

Comment : *This is something we strongly support and the need to extend its possible use across the West Midlands*

SP44: Extension of Midland Metro and Bus Rapid Transit (BRT) to key economic centres

Comment : *We strongly support this but it must be balanced with improvements to other public transport. The quality of BRT should not be accompanied by a reduction or even stand-still in the quality of other buses.*

SP45: Birmingham Airport – support for expansion and development of new services as well as local connectivity

Comment : *Agree - improving local public transport connectivity will be very important.*

SP46: Support mutually reinforcing land use and transport planning through development location and density relating to the transport network

Comment : *Agree – this is very strongly supported. There is a need to ensure that appropriate political, administrative and professional support arrangements are put in place to facilitate this approach across the wider city-region*

SP47: Promote waste management solutions in line with application of the waste hierarchy and targeting promoting the potential of waste as a resource

Comment : *Agree – this is supported.*