

## **Introduction**

This is Birmingham Friends of the Earth's response to the Birmingham Development Plan. We have responded according to the section headings in the draft plan. We hope that this response is useful in using planning policy to make Birmingham a greener and more sustainable city in the future.

## **Section 3 – The Vision Objectives & Strategy**

### **3.13**

We are opposed to the loss of further Green Belt land to development, in particular land at Peddimore. There are many large brownfield sites across the city, including The Hub, Witton, Bromford and Longbridge. In addition there are numerous brownfield development sites through the neighbouring local authorities of the Black Country, and we feel Birmingham should, through it's duty to co-operate, seek to work with these authorities to support the development of brownfield sites throughout the West Midlands county before allowing the loss of Green Belt and green field land for development. We seek the removal of Peddimore from the BDP, or at the very least the concession that it is held in reserve until all brownfield employment use sites of comparable size within the West Midlands county have been developed, resulting in the land's release only if it is absolutely required as a last resort.

## **Section 4 – Planning for Growth**

### **Policy PG1 – Overall Levels of Growth**

Planning for growth in both the capacity to recycle and to dispose of waste would be contradictory, as these are alternatives; if recycling increases, then disposal must decrease. The overall tonnages of waste arising in both domestic and commercial sectors are falling and these are national and international trends, so there is no longer a positive relationship between economic growth and waste generation. The vast majority of wastes can be composted digested or recycled. Birmingham should therefore plan for a big contraction in disposal of waste by burning or burying, in the near future, in order to meet its carbon reduction and air quality targets. This would then accord with the principles of TP13, which we support.

We would question the figures required for levels of new housing required, and the figure for this should be continually revised to take into account the most recent available population and housing requirement figures. We would again request that empty and underused homes are addressed as part of this target, and that building conversion and brownfield land use are targeted first, followed by brownfield development in neighbouring authorities under the council's duty to co-operate, and lastly the release of green field and Green Belt land, the latter of which must be strictly controlled and held back.

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### **Policy PG2 – Birmingham as an International City**

Whilst positioning the city international is important, it is also necessary to create and support Birmingham based local business that support the population and ensure that money and investment is captured and

retained within the city. Making the city attractive and work for its own people and communities will automatically make it so for the international community.

### **Policy PG3 – Place Making**

We support the aims of this policy in creating attractive, successful and sustainable places.

## **Section 5 – Spatial Delivery of Growth**

5.11

We oppose the loss of Green Belt land for development. We would again request that empty and underused homes are addressed as part of this target, and that building conversion and brownfield land use are targeted first, followed by brownfield development in neighbouring authorities under the council's duty to co-operate, and lastly the release of green field and Green Belt land, the latter of which must be strictly controlled and held back until all other brownfield sites and options (as above) are used up or substantially used up (say in excess of 90% used). This approach would safeguard the Green Belt and encourage new housing development in existing built up areas that already have local facilities and infrastructure, especially public transport, thus providing housing on the most sustainable sites first. Such a policy would concentrate development in areas in need of regeneration.

We would also urge an increase in the minimum density levels required, taking this upwards of 50 dwellings per hectare.

### **Policy GA1 – City Centre**

5.29

We support the diversification of the city centre, especially retail uses. Birmingham has a low percentage of small independent retailers and the encouragement and expansion of this sector should be pursued. Birmingham should seek to be different rather than being simply another 'clone town' with the same outlets as anywhere else.

There are significant opportunities for the expansion of the retail markets with the redevelopment of the wholesale markets site, including the removal of roads that currently constrain the markets site. The retail markets provide a vital resource for the people of Birmingham, providing affordable access to fresh and healthy food, and therefore we feel they should be protected, enhanced and expanded. The expansion could also allow a greater diversity of market holders and products sold, creating a resource not only for the community of Birmingham, but also a tourist and visitor attraction in its own right, showcasing local and regional food at its best, much like markets in London and throughout the continent and the wider World. We feel the markets should be the beating heart of the retail offer in Birmingham. The focus on food in this area of the city would also lend itself well to food education, possibly including the relocation of the College of Food to the area.

### **Policy GA4 – Sutton Coldfield**

We agree with the mixed use development within Sutton Coldfield town centre. However this should be focused in the first instance to bring back into use empty commercial and office accommodation. For example the empty units within both the indoor market and Gracechurch shopping centre. There could also be a case for checking the feasibility of increasing above shop living accommodation within the centre.

While we welcome the initial provision of bike stands within the pedestrianised area, there is no mention of increased cycle provision within the plan specifically for Sutton Coldfield. For example, as well as providing better pedestrian links there could be safe cycle routes from outlying areas into the shopping centre to

encourage more sustainable transport. This should be in partnership with London Midland and other transport providers in order to increase cycle usage across the board in line with the BMP.

On top of this safe provision for cyclists should be factored into all road junction improvements, especially along the proposed Birmingham Road sites and extending into the town centre in both directions including to Wylde Green.

We broadly support the idea of taking private transport outside of the town centre whilst encouraging and providing for greater use of public transport, but reserve comments until we see a more detailed plan and assessment of the relief road development on the area where it will take place.

### **Policy GA5 – Langley Sustainable Urban Extension**

We oppose the loss of Green Belt land for development. Our submissions in response to the Green Belt options consultation is also included for additional information about our views about this extension.

We would again request that empty and underused homes are addressed as part of this target, and that building conversion and brownfield land use are targeted first, followed by brownfield development in neighbouring authorities under the council's duty to co-operate, and lastly the release of green field and Green Belt land, the latter of which must be strictly controlled and held back until all other brownfield sites and options (as above) are used up or substantially used up (say in excess of 90%) used. This approach would safeguard the Green Belt and encourage new housing development in existing built up areas that already have local facilities and infrastructure, especially public transport, thus providing housing on the most sustainable sites first. Such a policy would concentrate development in areas in need of regeneration.

Worryingly, it appears that a significant amount of time, effort and resources have been expended on the proposals already, including detailed highway requirements. We are opposed to the development for the reasons set out above, and feel that this land should be held back in reserve for use only when brownfield land has been exhausted.

The site is currently not well served by public transport, and given the proximity of the Sutton Coldfield by-Pass there will be every chance the development will be highly reliant on the private car. As a condition of this development taking place (in addition to the holding in reserve of this land - mentioned above), we would urge the local authority to insist on the reopening of local stations and passenger services on the Sutton Coldfield Park Line prior to the start of development in order to provide a decent level of rapid public transport to the area. This would aid the sustainability of the development.

However, we are a little relieved to see the commitment to any development on the site being part of an exemplar sustainable urban extension.

### **Policy GA6 – Peddimore**

We are opposed to the loss of further Green Belt land to development, in particular land at Peddimore. There are many large brown field sites across the city, including The Hub, Witton, Bromford and Longbridge. In addition there are numerous brownfield development sites through the neighbouring local authorities of the Black Country, and we feel Birmingham should, through it's duty to co-operate, seek to work with these authorities to support the development of brownfield sites throughout the West Midlands county before allowing the loss of Green Belt and green field land for development. We seek the removal of Peddimore from the BDP, or at the very least the concession that it is held in reserve until all brownfield employment use sites of comparable size within the West Midlands county have been developed, resulting in the land's release only if it is absolutely required as a last resort.

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### **Policy GA7 – Bordesley Park**

We support the redevelopment of the Bordesley Park area. We are especially supportive of the proposed reopening of the Camp Hill Line to local rail services. However, this requires the construction of the Bordesley Chords, and therefore land to be reallocated and reserved from development to allow these to be built at a sensible cost. Much like Highway Improvement Lines, the area of land required for the Bordesley Chords should be protected within the plan.

### **Policy GA8 – Eastern Triangle**

Whilst we support the redevelopment of the Eastern Triangle, we are opposed to the development of the former Bulls Head Allotments, as well as those on Burney Lane and Francis Road. This goes against Policy TP9 that protects allotments from development even if they have been left unused. The use of these allotments should be retained as allotments, or failing that be converted to other green space (such as playground, playing fields, park) as Policy TP9 stipulates. The reuse of brownfield land and the densification of the area should be carried out to enable the retention of the allotments whilst creating the required number of homes.

The whole of East Birmingham is blighted by the Veolia incinerator at Tyseley, which burns 100,000s tonnes of rubbish per annum. It is a bad neighbour and the largest source of air pollution and visual intrusion in the area; horrible smells of rotting rubbish are blown from it downwind over residential areas. Making East Birmingham into an attractive residential area will require that this outdated facility is planned for closure. The Tyseley Environmental Enterprise Area runs a great danger of further blighting residential areas of East Birmingham with bad neighbours and associated traffic TP15

### **Policy GA9 – Selly Oak & South Edgbaston**

We agree with the view that Selly Oak should be developed and regenerated for mix of uses and different types of economic activity should be developed in the area.

We note that the policy states quite specific plans to finish off the Selly Oak New Road. However the package of enhancements and improvements for public transport pedestrians and cyclist seem quite vague by comparison. We hope that enhancements for pedestrians does not mean more street furniture and barriers which make any centre less friendly to pedestrians, and less of a space for people.

The proposed developments in Selly Oak risk causing problems on the current system, particularly the road network. In order to avoid the danger of new developments resulting in ever increasing numbers of cars using the road network, we need comprehensive active and public transport provision in and around Selly Oak. A good cycle network and an increase in public transport provision are a must if there is a sizeable increase in developments. Bus Rapid Transit as advocated in the Birmingham Mobility Action Plan would provide a second rapid transit to the city centre.

If new houses are developed on the old hospital site then this new estate will need to have an entrance or open out onto the Bristol Road side as well as the Raddlebarn Road side. Good walking and cycling routes need to be provided from that site towards the station and the Bristol Road across the canal, so people have a

quick and easy route to public transport. An exit this side would also reduce pressure on the Raddlebarn Road and Oak Tree Lane.

If a new supermarket is to be built on the Battery Park site, we believe that the developer should be funding the necessary improvements to public and active transport for the area. This is because the supermarket will benefit from the areas transport links and a larger supermarket will also have a greater impact on them. We believe this also applies to the other major beneficiary of the area, the university.

We believe the Lapal Canal restoration needs to be more than simply supported, and should be a condition permission for the supermarket and other Battery Park developments mentioned.

## **Section 6 – Environment & Sustainability**

### **Policy TP1 – Reducing the City's Carbon Footprint**

This is overall a very good and ambitious policy. It could be said there is an imbalance in the sense that it is too city centre focused. There could be more to support local energy cooperatives in the outskirts of Birmingham and where there are different environmental constraints and resources.

### **Policy TP3 – Sustainable Construction**

There isn't enough mentioned on retro-fitting our current housing stock and no mention on retro-fitting our industry. The policy is strong on other accounts but in a city where we have such high rates of fuel poverty and poorly insulated old builds more could be done to include retro-fitting in with new proposals.

### **Policy TP4 – Low Carbon and Zero Energy Generation**

The use of CHP and district heating schemes are a very good way in working towards your ambitious target. It is worth noting that although extremely efficient it is still dependant on fossil fuels but a good balance with alternative technologies is a good approach for a city of Birmingham's landscape.

The Plan mentions SMART grids, however it appears to be a bit vague in its approach, using words such as 'promote' and 'encourage'. A lot of the academic community agree that SMART grids are the future, if we want a successful low-carbon city and it could save a lot of money by making all new builds SMART grid ready. Rather than finding ourselves in a situation when we are in the process of retro-fitting modern buildings to incorporate a SMART grid that could have been avoided.

### **Policy TP5 – Low Carbon Economy**

Overall good policy but special consideration needs to be taken for waste. Waste has the opportunity of being a large resource for Birmingham's energy production but more should be put in to ensure that it is done in a sustainable way, such as anaerobic digestion and pyrolysis compared to putting it through an incinerator. Another note is the use of biomass. This again needs to be heavily monitored as irresponsible sourcing and use can quickly make biomass technology counterproductive or even destructive to having a zero-carbon Birmingham.

### **Policy TP6 – Flood Risk**

It is generally accepted that increased risks from flooding are a symptom of climate change resulting from increased concentrations of atmospheric carbon dioxide from burning fossil fuels. Risks from flooding are predicted to become worse in the future.

The problems have been exacerbated in many catchments by an increased proportion of land under impermeable surfaces.

The starting point in addressing the increased risks from flooding is to tackle the underlying cause of climate change by reducing carbon dioxide emissions. We welcome policies in other parts of the Birmingham Plan which aim to achieve this, and on which we comment elsewhere in our response.

However as the problem of increased flood risk is already with us and is predicted to worsen even with current levels of CO<sub>2</sub>, measures need to be in place to better manage surface water run-off and reduce flood risk.

We note that the Birmingham Plan acknowledges that the requirements of the Birmingham Strategic Flood Risk Assessment (SFRA) should be taken into account. The Plan should take into account the Surface Water Management Plan once this has been issued.

#### Surface Water Drainage Assessment

In referring to restrictions in run-off rates for new developments, mention should also be made for the necessity to make an allowance for increased storm intensity as a result of climate change.

The cumulative effect of many small installations of impermeable surface is changing the nature of the city's drainage and the policy should include enforcement of restrictions on the companies who tarmac and slab. We would like to see model standards for green car parks led by the city council. Small gardens and lawns and landscaped areas constitute a large part of the city's Green infrastructure and this needs recognising and protecting in Policy TP7 Green infrastructure.

#### Sustainable Drainage (SuDS)

In accordance with NPPF technical guidance, TP6 notes that priority should be given to infiltration measures for all new developments. Where ground conditions make these unsuitable, we would like to see specific mention of above ground SUDS measures such as swales, retention ponds and green roofs. Underground storage tanks and oversize pipes should only be considered once it has been established and demonstrated by the developer that ground conditions are unsuitable for infiltration measures and that above ground SUDS cannot be used.

The policy does not seem to include the storage and use of water run off, which should be treated as a resource. Storing water will slow speed of run off into drains. Currently drinking water is used for many non potable purposes and this is costly and unsustainable. Sustainable Urban drainage should include standards for the storage and use of water run off.

Developers should be encouraged to consider SUDS measures and the surface water drainage strategy at an early a stage as possible in the development process so that maximum benefits can be secured in terms of surface water management and enhancement of biodiversity. It is often the case that the developer considers drainage too late in the development process, so that the drainage solution used could have produced greater benefits in terms of surface water management and biodiversity had it been considered earlier on.

Small developments such as extensions covered by permitted development rights may not individually increase flood risk, but cumulatively may significantly increase flood risk. This should be taken into account and consideration given to removing these rights in areas where flood risk may be increased by such minor developments.

Paving over gardens with impermeable hard surfacing may collectively increase flood risk and is now controlled by the 2008 General Permitted Development Order. Consideration should be given as to how such development may be better controlled and enforced.

In accordance with the recommendations made in the SFRA, a SUDS strategy should be developed as Supplementary Planning Guidance.

#### Rivers and Streams

More intense rainfall events and increased run-off will result in an increase in the number of properties affected by flooding. However more erratic and extreme weather may see areas flooded which had never before been predicted to flood.

Against this background, it may be necessary to set aside additional land for flood storage purposes, and there may be some areas of land which were once protected from flooding but may no longer be defensible. Consideration should be given to allowing some areas of previously developed land which are now derelict and fall within Flood Zone 3 to remain undeveloped and serve as flood storage areas. Such areas could be managed to benefit wildlife, serve as amenity land and could reduce flood risk to properties on other areas of land.

We note that considerable stretches of river within the city are culverted or in engineered channels, which increases the risk of flash flooding. We would therefore like to see a stronger presumption against culverting of existing open channels.

We strongly support the policy of opening up river channels by removing culverts and engineered channels where new development is taking place. This could potentially benefit wildlife, increase the amenity value of the treated stretch of river and reduce flood risk.

#### Trees and Woodland

We welcome the encouragement of tree planting for surface water management purposes, but believe that this policy could be strengthened by making it one of the requirements for new developments in a SUDS strategy SPG.

#### **Policy TP7 - Green Infrastructure Network**

We are generally pleased to see real protection for green spaces and the requirements for increased green infrastructure.

#### **Policy TP8 - Biodiversity & Geodiversity**

We are pleased to see good levels of protection for biodiversity and geodiversity, however, we do not believe that 'compensation' is an adequate way of replacing lost biodiversity. If any development is not able to be minimised and fully mitigated for, then it should be refused.

#### **Policy TP9 - Open Space, Playing Fields and Allotments**

We are pleased to see protection for these spaces and that this is driven by measurable standards for provision. We are also supportive of open space changing use to other forms of open space rather than being built upon.

In the case of allotments, we feel this policy needs to provide stronger protection to ensure that allotment provision is maintained for the long term and future generations. Interest in allotments has been rising lately, and current demand can't be taken to be future demand. In order to tackle climate change, food security and rising food prices, allotments will become increasingly important in the future. We urge protection for all allotments with refusal for all development proposals upon them.

### **Policy TP10 - Green Belt**

We are opposed to the loss of further Green Belt land to development on the basis that it will be required for food growing, to absorb organic nutrients from the city, absorb rain, tree planting to reduce winds, for amenity and leisure, even for woodland burials – it is a resource not ‘a site’. The green belt restricts the size of the built up area. Once it is breached it creates a precedent for further expansions of the built up area. The need to preserve green belt so that we can grow our food supply more sustainably in the future, cannot be overstated. Just because land is not needed or used for food growing now does not mean that it will not be in the future.

There are many large brownfield sites across the city, and in addition there are numerous brownfield development sites through the neighbouring local authorities of the Black Country. We feel Birmingham should, through it's duty to co-operate, seek to work with these authorities to support the development of brownfield sites and under used buildings throughout the West Midlands county before allowing the loss of Green Belt and green field land for development. We seek the removal of all development plans on green belt from the BDP, or at the very least the concession that it is held in reserve until all brownfield sites within the West Midlands county have been developed, or substantially used up (say in excess of 90%) resulting in the land's release only if it is absolutely required as a last resort.

This approach would safeguard the Green Belt and encourage new housing development in existing built up areas that already have local facilities and infrastructure, especially public transport, thus providing housing on the most sustainable sites first. Such a policy would concentrate development in areas in need of regeneration.

### **Policy TP13 – Sustainable Management of the City's waste**

This is a good policy but the measures seem to be in contradiction with its principles. We do not support the aim of dealing with all waste within city boundaries. Historically organic waste was composted and returned to fertilise surrounding agricultural soils. It would not be at all appropriate to dispose of this by burning etc within the urban area. The 21<sup>st</sup> century solution to waste is anaerobic digestion, which produces liquid fertiliser that should be returned to food production. Pyrolysis also produces biochar that may improve agricultural soils and water retention. Therefore using waste as a resource is not compatible with the idea of self sufficiency within Birmingham boundary, which would involve destroying wastes not using them sustainably.

6.83

The idea of increasing the City's waste disposal capacity is in contradiction to the declining waste streams and the increasing opportunity to digest and recycle wastes. Disposal and recycling are alternatives, so both cannot expand. The Plan does not reflect the transformation of the waste industry which is underway in the direction of recovering, not destroying the value in waste.

### **Policy TP15 – Location of waste management facilities**

The Tyseley incinerator is the largest source of carbon dioxide emissions in the city, and so meeting policy TP1 & TP4 Carbon reduction will require its planned closure. The Tyseley Environmental Enterprise Area runs a great danger of further blighting residential areas of East Birmingham with bad neighbours and associated traffic so contradicting policy GA8.

We agree that waste operations should be enclosed within buildings or sealed structures in order to minimise impacts on adjacent uses. The implication would be zero emissions to air, which some waste operations can deliver whereas mass burning of rubbish cannot.

## **Section 7 – Economy & Network of Centres**

### **Policy TP16 – Portfolio of Employment Land and Premises**

We do not agree with the land portfolio hierarchy in TP16. We feel that reserving the best land to those clients with a regional national or international choice of land does not support a strong locally regionally centred economic strategy. Having local or regional businesses means that the economic benefit of those industries stay in the region. The land portfolio hierarchy should reflect this. The best quality land should not be reserved for national or international clients, but at least be partially for development by local businesses.

### **Policy TP17 – Regional Investment Sites**

We applaud the regional investment sites being positioned in the areas of greatest need and the criteria that they must have good public transport links. We do however feel that their use should not be restricted to one large use or industry, and a more flexible mixed use approach should be considered.

### **Policy TP18 – Core Employment Areas & Policy TP19 - Protection of Employment Land**

We agree that it is right that employment land is protected. We also strongly support the statement that as much freight movement as possible should be by rail. We note that the two areas mentioned are in good locations for the majority of the freight to be by rail. These favourable locations should be fully taken advantage of by ensuring that the rail facilities at Longbridge and Aston exist to allow the maximum amount of rail freight transport.

Again we support the desire to protect employment land however, we question the core employment approach to this, as we would worry that areas get categorised into exclusively employment areas or exclusively residential areas. We would want to see mixed areas so people are able to travel shorter distances to work, as opposed to business parks which are often not well-connected to traditional centres and good sustainable transport links.

### **Policy TP20 – The Network and Hierarchy of Centres**

We agree that it is undesirable to allow too disproportionate a balance between office and retail space. However, we feel that district centres that can function as economic centres in their own right should be encouraged as much possible. This is also the same for local centres. This means allowing uses other than simply retail in local centres. Development policy is possibly currently geared too much towards a single city centre. We are pleased to see that out-of-centre proposals will not be accepted unless they satisfy national planning requirements. We would argue that this should be even stronger and that out-of-centre developments should not be accepted unless there are exceptional circumstances.

### **Policy TP22 – Small Shops and Independent Retailing**

We are very pleased to see policy around supporting independent retailers. However independent or locally or regionally owned retail needs to be at centre of retail provision not an add-on. Independent locally owned retailers provide a more diverse retail offer and ensure that money stays in the local or regional economy. City centre independent retail is currently dire. This can only be addressed by making it easier and cheaper for independent shops to set-up in the city centre. Measures such as rent or rate reductions need to be considered as well as favouring retail developments from independents.

### **Policy TP23 – Promoting Diversity of Uses Within Centres**

We agree with the statement that we need to provide centres with diverse uses, and while retail is important there are local economic benefits to having other uses in centres. Local and district centres can also provide local services and local jobs as well as retail. Having several centres of small economic activity makes for more cohesive local communities and reduces the need to travel across the city.

### **Policy TP25 – Local Employment**

We applaud the desire to use local supply chains and promote local jobs as much as possible. We feel that developers should not only be encouraged but required to do this. In many ways smaller companies and independent shops are in a better position to do as they are more likely to already use local suppliers and give jobs to local people. Furthermore smaller independent shops and businesses have been shown to employ more people than larger shops and businesses that serve an equivalent number of people.

## **Section 8 - Homes and Neighbourhoods**

### **Policy TP26 - Sustainable Neighbourhoods**

We generally support the policy of sustainable neighbourhoods. However, it will be important for planning to work closely with other council departments and outside bodies to ensure that this policy is delivered, as there are levers that are outside of the remit of planning. For example, planning may be able to identify a need for a school and approve its construction, or plan housing development around an existing school, but the school needs to be of a high quality in Ofsted ratings in order to attract students and families to live in the vicinity of the school. Access to good schools is a significant driver of housing need and type.

### **Policy TP29 - The type, size and density of new housing**

We support the use of increased density in the city centre and in areas supported by good public transport. However, we feel the minimum density of housing should be raised to 50 dwellings per hectare.

### **Policy TP34 - The Existing Housing Stock**

We welcome the support given to the reuse and refurbishment of existing housing (and buildings into residential where appropriate). There are many empty homes across the city, and buildings that are no longer useful for their original purpose and are suitable for conversion to residential use. Empty space above commercial properties should also be used as a means of providing homes, as well as encouraging people to live in district centres to create more mixed neighbourhoods. The council should also look at means of better use of existing under occupied homes, such as provision of smaller dwellings in areas where large houses predominate (so people have the opportunity to downsize without leaving their neighbourhood), or offering schemes for people to move to a more appropriately sized property, such as a property 'swap shop' or similar.

## **Section 9 – Connectivity**

### **Policy TP 37 – A Sustainable Transport Network**

It should be remembered that transport needs and trends are a result of economic policies and trends. The current high demand for transport is due to a increasingly unstable and flexible labour market, the increasing centralisation of economic developments, the high cost of housing and the increasing industrialisation and centralisation of food and goods.

The Birmingham Development Plan claims that it wants to: reduce carbon emissions; improve air quality; minimise transport's impact on the environment; support the sustainable and efficient movement of goods reduce congestion and road accidents; and support and promote sustainable travel.

In that case, Green Belt development, expansion of the city's limits and the growth of centralised economic developments such as 'hubs' and the airport are completely incompatible with the aim of having a more sustainable transport system.

Another major problem with the BDP connectivity section is that there is no mention of redesignation of road space to better cater for more sustainable transport modes. These redesigns are talked about in great detail in

the Birmingham Mobility Action Plan and we need to see joined up thinking from the council's transport and development planners.

This plan needs to have greater emphasis on redistribution of road space and greater emphasis on reducing car journeys, as in the BMAP.

### **Policy TP38 – Walking**

9.12

We very much support the prioritisation of pedestrians at the top of the road user hierarchy and we feel that for walking to be a truly safe, attractive and convenient means of getting around, some fundamental redesign is needed. In areas where there is or could be lots of pedestrian footfall such as most areas of the city centre or busy shopping high streets – where there are often unattractive and inconvenient subways and double road crossings etc. – transport planners in Birmingham must look to redesign junctions and carriage ways to prioritise pedestrians. In many cases, it should not be about 'providing pedestrian crossing facilities', but rather redesigning a carriageway so that vehicle users know they have the responsibility to give way to pedestrians at all times.

[http://www.sustrans.org.uk/our-services/what-we-do/route-design-and-construction/shared-space-busy-intersection-poynton?dm\\_i=6EB,1G1M5,9TH7B7,4WMFR,1](http://www.sustrans.org.uk/our-services/what-we-do/route-design-and-construction/shared-space-busy-intersection-poynton?dm_i=6EB,1G1M5,9TH7B7,4WMFR,1)

Changing traffic light sequences to speed up the flow of road traffic, as Birmingham City Council have recently been doing, is not in-keeping with putting pedestrians at the top of the road-user hierarchy. Until this way of way of doing things is done away with, it is impossible to believe that BCC will achieve the goals for walking laid out here.

9.15

There needs to be a clarification and a commitment in the BDP that, when roads in Birmingham are re-laid or are having any other maintenance, walking and cycling infrastructure is put in as matter of course. This is about better communication between the council and Amey or any other contractor, but ultimately the responsibility for this not being the case currently lies with the council.

For example, if a section of road needs relaying, it may be best to allocate or even reallocate funding sources to undertake a larger project of carriageway or junction rebuild.

### **Policy TP39 – Cycling**

9.16

We would most certainly agree with the statement that 'Cycling contributes towards reducing carbon emissions, and improving air quality.' As a form of active travel it can assist with the adoption of healthier lifestyles and managing the use of the City's transport network more efficiently.' This is exactly the logic behind Birmingham Friends of the Earth's air quality and active transport campaign 'Let's Get Moving' so we are pleased to see that the BDP thinks along the same lines.

9.19

However 'Birmingham has some good cycling infrastructure' is rather an overstatement. Birmingham has very little good cycling infrastructure and its funding must be seen as an immediate priority. We are in support of the idea to start with the city centre, but are concerned by a potential lack of funding to follow through to the funding of later phases.

Again a change in the mentality of transport planners and implementers is needed to, in any way, significantly increase the modal share of cycling in Birmingham. Redesign and better communication with Amey will also be necessary to turn Birmingham into any sort of 21<sup>st</sup> century city with regards to cycling. When roads are being dug up or relayed as a matter of course, some incorporation of safe, modern cycle lanes should not be particularly costly. We are enthused that BCC has £24 million to spend on cycling infrastructure over the next two years, but unless it continues to be consistently funded after that period, which at present doesn't appear to be the case, we can't see how BCC will achieve any sort of shift in modal share leading up to 2031, so we await to see BCC's cycle funding plans after 2015.

9.20

One issue we have with the Birmingham Cycle Revolution is the intention to spend a quarter of its funding on canals alone. Whilst we like the idea of encouraging leisure cycling, with limited funding and an aim to increase cycling mode share, this decision is clearly a poor one and typical of the mentality mentioned above as it is an easy option, seeking to take cyclists away from the roads so not 'interfering' with other road traffic.

#### **Policy TP40 – Public Transport**

9.24

There isn't any mention of the air pollution problems caused by diesel buses, especially in the most built up environments like the city centre. The BMAP talks of trying to follow Manchester's example, where there has been the introduction of 250 hybrid buses.

9.26

There needs to be an admittance that Birmingham and the wider Midlands region has not seen nearly enough funding from central government for public transport, especially rail.

According to the 2011 West Midlands and Chilterns RUS, the number of passenger rail journeys made to/from and within the West Midlands region is predicted to increase by 30 per cent between 2008/09 and 2020/21, equivalent to a 2.2 per cent increase per annum (2.3% on routes to Birmingham). However, the average passenger growth being experienced on the West Midlands metropolitan area rail network in recent years has been around 5.5% year on year.

9.28

It is good to see new stations and new lines such as Camp Hill and Sutton Park in the plan and we are fully in support of these. However, there needs to be greater detail and a much stronger active and positive commitment to connect to those new lines and stations. This means not developing something which cuts new stations off from being well-connected by bike, bus or foot. It also means not planning something which stops the lines or stations themselves being built.

9.29

It is good that the park and ride network is being thought about in terms of aiming to achieve a more sustainable city, so discouraging car use as far as possible.

There are advantages and disadvantages of park and ride. There can be problems when building lots of car parks next to stations – it can encourage people to drive there as opposed to going to their nearest station or using other means to get there. The BDP needs to distinguish between edge of the city park and ride, where the car is often the only way of reaching the station and middle of the urban area park and ride, where there are sustainable transport alternatives to reach the a railway station.

Any increase in park and ride must come with a set amount of cycle parking facilities and a set amount of car sharing spaces and car club spaces at a station.

9.30

The SPRINT bus rapid transit network needs to be incorporated better into the Birmingham Development Plan and given greater priority, since it is suggested by the BMAP to be of central importance to future infrastructure planning in the city.

9.31

We certainly don't feel Birmingham Airport needs any more help from the local council to expand, and there are plenty of economically more beneficial rapid transit routes to be undertaken before looking to improve connections to Birmingham airport, since they are more than adequately served by the existing railway.

#### **Policy TP41 – Freight**

9.34. 9.35

We feel that not enough is suggested in the BDP to make freight transport more sustainable. There needs to be an addition to the BDP plan which is in the BMAP. This is the idea of having freight trucks to hubs and then cycle couriers or low emission vehicles the rest of the way to improve the city's air quality and cut down on congestion and accidents.

Another idea is that the city could have both freight trains and canal barges, depending on the type of material/freight, come in close to the city centre to then drop freight off to cycle couriers or low emission vehicles who can distribute freight locally. This has been successful in Amsterdam.

Currently, 44 tonne articulated lorries are used for many local deliveries to shops and supermarkets in local centres where roads are too narrow and corners too sharp to accommodate them without difficulty. In this setting, they can cause considerable traffic congestion. Lorries of this size should be excluded from certain areas, and operators directed to use smaller vehicles.

We certainly agree that developments which generate large volumes of freight traffic or involve the transport of bulk materials should make use of rail (or water if appropriate) for freight movements wherever practical.

The language in the plan around rail freight needs to be strengthened – it should be protected and expanded and not just encouraged.

With the prospect of HS2, the possibilities of using this as a freight route suitable for taking freight trains of European loading gauge may be possible, in much the same way that direct freight trains from London to mainland Europe are currently using HS1 at night times. The use of HS2 for such freight should be promoted and land identified which could be made available for an HS2 connected freight hub, for instance in the vicinity of the current freightliner terminal at Lawley Street.

9.38

We feel increasing air freight must be strongly discouraged. Apart from the obvious environmental insanity of attempts to increase air freight, there is also the economic insanity – it takes exponentially more energy to move freight by air than by any other means of transport and only massive fuel subsidies allow airline companies to think of it as a possibility. Ultimately, the UK and Birmingham taxpayers are subsidising air freight activity.

9.39

The BDP needs to fully research the possibilities which canals as a freight transport networks including the ideas we have mentioned above

### **Policy TP42 – Low Emission Vehicles**

9.40

We agree that low emissions vehicles need support in a city like Birmingham, which has serious air quality problems and also needs to reduce its CO2 emissions. However we question why this has not been supported well in the past, and whether the mobility action plan is forthright enough on this issue. We feel, for example, that the recently launched Car 2 Go scheme should have involved fully electric vehicles.

9.42

Lending ‘support’ to the uptake of low emission vehicles is not a strong enough commitment. These types of sustainable developments need to be a fully integrated part of planning policy with targets, and not just tacitly ‘supported’ or ‘facilitated where appropriate.’

### **Policy TP43 – Traffic and Congestion Management**

#### Highway Improvement Lines

We are worried at the suggestion of future potential road widening developments known as Highway improvement lines. We feel that highway improvement lines should be for public and active transport use only, and not be used to increase car capacity, which the council has clearly stated it wishes to reduce in the BMAP document, whilst the BDP talks about creating a more sustainable transport network.

A high capacity road network should be aimed at modal shift away from car use. When planners talk of capacity, they continually fail to realise that increasing capacity for cars again and again means money is being diverted from more sustainable transport infrastructure, therefore encouraging car use by catering more for cars. When capacity for cars is increased, more cars will come to fill that capacity and you will end up having to find more and more ways to increase capacity as congestion peaks again, eventually leaving no space and an extremely unsustainable and unhealthy transport network.

There is also an obvious conflict between free-flowing traffic and a friendly walking environment which the BDP says it wishes to achieve.

BFOE would like to suggest that Birmingham City Council could have railway improvement lines instead, in order to protect land needed for rail improvements as they do with roads.

### **Policy TP44 – Accessibility Standards for New Developments**

9.57 & 9.58

We don't believe that accessibility levels in Birmingham can be proven to be ‘generally good’ (in comparison to what?), certainly not when considering the facts that almost 36% of Birmingham residents do not own a car but is a city predominantly designed for the car. This would suggest that Birmingham is a relatively inaccessible city for a large proportion of people.

9.59, 9.60, 9.61

We would agree with the sentiment here though again the wording (ideally, good, appropriate) and in policy TP44 needs to be stronger and more definitive for any development criteria. All new developments should have to provide or contribute to improved public and active transport provision.

### **Policy TP45 – Digital Communications**

9.62, 9.63

We welcome a better digital communications infrastructure and the future proofing of any new developments, though it is important this infrastructure is not abused.

9.66

An efficient ITS system is definitely a worthwhile investment in Birmingham, but as with other projects, it needs to be fully integrated and designed in a way that allows it to be incorporated into new technological developments, such as the swift card and new bus rapid transit services when they arrive.

Dealing with congestion is not simply about filling up capacity in the most efficient way by the use of an ITS, but at the same time pursuing policies which are likely to reduce overall traffic numbers, such as decentralisation. If Birmingham City Council is not doing both concurrently, then at some point capacity will be full up and there will be no technological solution, so exasperating congestion problems.

### **Section 10 – Implementation**

10.2, 10.3

When working in partnerships and drawing up contracts, we urge Birmingham City Council to drive a hard bargain for the people of Birmingham. Contracts and developments should be first and foremost about delivering for the environment and the people of Birmingham before the needs of developers and contractors.

10.7

We are concerned that rather too much priority is given to large scale businesses in the city centre when it comes to enterprise zones. There must be an effort to promote something similar to enterprise zones in local areas and for independent retailers in the city centre. These are the businesses which are far better at supporting the local economy.

10.10

The City Deal provides a great opportunity for the local council to use power in a locally beneficial way by supporting sustainable growth and infrastructure with the best returns on investment (for example cycling)

10.15

The pace of recovery of the national economy may be directly outside the City Council's control, however, the City Council can have a huge impact on the recovery of the local economy by pursuing decentralisation and localisation policies which will produce, retain and better circulate money in the local economy.

10.17

The City Council must drastically improve its coordinating of partners since we have seen unacceptable breakdowns in communication and bargaining positions in the recent past, not only between the council and its partners (e.g: Veolia, Capita, Amey) but also between different council departments.

10.18



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We are concerned about the LEP having too much of a role in delivering the growth agenda for Birmingham. This is because although it has more resources, its democratic accountability is completely insufficient.

### **Test Of Soundness**

Whilst we still feel there is room for minor improvements, as commented upon, we think that overall the plan is sound. Obviously the Duty to Cooperate will need ongoing work to address housing and employment uses, as well as transport across the West Midlands conurbation and region, but this can be overcome and does not appear to undermine this plan.