

Longbridge Area Action Plan	Birmingham Development Plan	Key Inconsistency	Impact upon Delivery
<p>Policy S1 – Building Standards – All developments are to be accompanied by a sustainability statement demonstrating how the building standards as set out are to be achieved; Level 4 on adoption of the Area Action Plan (April 2009) A target of Level 5 by 2012 A target of Level 6 by 2016 Non residential buildings will target BREEAM Excellent standards</p>	<p>TP3 – Sustainable construction – From 2016 all new residential development should aim to be zero carbon and all new non residential built development in excess of 1000 sq. m gross permitted floorspace should aim to meet BREEAM Excellent</p>	<p>BDP policy applies to development from 2016 whereas the AAP policy applies standard immediately from adoption of the AAP with standards increasing to 2016. For non residential development, the BDP policy applies from 2016 and then to buildings over 1,000 sq. m whereas the AAP policy applies to all development no matter what size of building.</p>	<p>Longbridge is placed at a significant disadvantage with its policy being significantly more onerous and impacting significantly upon development cost. Delivery and investment in Longbridge will be detrimentally affected by higher sustainable building standards applying. The City Council have not explained why higher building standards should apply at Longbridge.</p>
<p>Policy S2 – Site wide strategies to be submitted... to address the requirements Zero carbon by 2016 Maximise the generation and proportion of energy used from local and renewable or low carbon energy sources including CHP Meet a renewable energy target of 15% of energy demand from the AAP area</p>	<p>TP4 – Low and zero carbon energy generation – Developers will be expected to incorporate the provision of low and zero carbon forms of energy generation or to connect tint existing networks where they exist in proposals for new development, where practicable. In the case of residential development over 200 units and non-residential developments over 1,000 sq. m first consideration should be given to the inclusion of CHP.... However the use of other technologies will call be accepted where it can be shown they have the same or similar benefits</p>	<p>AAP policy is significantly more stringent to require development to be zero carbon by 2016. Rather than “consideration be given to” the AAP requires development to “maximise the generation and proportion of energy used from local and renewable sources” The BDP does not set a specific standard for renewable energy however the AAP states a renewable emerging target of 15% The BDP is more flexible in a number of ways and also only applies to development of a certain scale</p>	<p>Longbridge is again placed at a significant disadvantage with its policy being significantly more onerous and impacting significantly upon development cost. The additional costs of zero and low carbon technology is significant. It will impact upon delivery of development at Longbridge. Delivery and investment in Longbridge will be detrimentally affected by higher sustainable building standards applying and occupier interest will be directed to areas having lower building costs. The City Council have not explained why higher building standards should apply at Longbridge.</p>
<p>Policy DS1 – Development will be required to comply with the following design principles; Majority of parking in the RIS will be in multi storey and decked car parks In the RIS development will be a minimum of 3 storeys in height with elements of 4 to 5 storeys. At Gateway locations additional storey heights of up to 7 storeys may be appropriate</p>	<p>No specific policy</p>	<p>These specific requirements for the RIS at Longbridge are above and beyond anything set out in the BDP</p>	<p>These prescriptions add significantly to the challenge of delivery of development at Longbridge</p>

<p>Proposal LC1 A new local centre will be developed on the north works site. The new Local Centre will comprise the following uses;</p> <p>Retail upto 13,500 sq m Services comprising A2, A3, A4, A5 and other uses Leisure upto 5000 sq m A college upto 24,000 sq m 400 dwellings Live work units B1a Offices upto 10,000 sq m</p>	<p>GA10 Longbridge – The AAP has planned for the following levels of growth; 1450 homes, one Regional Investment Site, 13,500 sq m gross of comparison retail floorspace and 10,000 sq m of offices</p>	<p>BDP over simplifies the extent of development allowed for in the AAP and whilst summarises some of the permitted scale of development mistakenly includes 700 dwellings on land which actually falls within Bromsgrove District, 25,000 sq m of offices allowed for in the RIS, leisure uses upto 5000 sq m as well as a range of other uses</p>	<p>It is expected that the BDP would not override the AAP in terms of permitted uses and the scale of development allowed at Longbridge but GA10 is precise in stating that the AAP “has planned for”.</p> <p>The City Council has granted permission for a new Marks and Spencer store at Longbridge and this has increased the level of retail development beyond that envisaged in the AAP. It is common ground between the Council and St Modwen that Longbridge should be seen as a District Centre and this additional retail floorspace should be acknowledge in the BDP.</p>
<p>Proposal RIS 1 – Regional Investment Site comprising;</p> <p>25ha gross Technology Park of at least 15 ha to provide a minimum of 100,000 sq m of B1b, B1c and B2 B1b and B1c to be at a minimum of 7,500 sq m per hectare A maximum of 25,000 sq m of B1a for firms that support and compliment the high technology sector and the objectives of the RIS B1a uses at a minimum density of 7,500 sq m per ha A maximum of 10,00 sq m of services and amenities Measures to be set out to control uses within RIS</p>	<p>TP17 – Regional Investment Site - Regional Investment Sites (RIS) are intended to support the diversification and modernisation of the City’s economy. Regional Investment Sites are large high quality sites attractive to national and international investors in the order of 25 to 50 ha.</p> <p>Development on these sites will be restricted to high quality uses falling within Use Classes B1 and B2. Warehousing will only be supported where it is ancillary to the main B1 or B2 use. Complementary facilities to the RIS such as leisure facilities, small-scale retail and conferencing facilities may be supported but only at an appropriate scale and ancillary to the main B1/B2 use of the site. The potential for supporting facilities to be provided off site, through either new or existing facilities, will also be taken into account.</p>	<p>Various inconsistencies arise including considerably greater prescription within the AAP but generally including;</p> <p>B1a office unrestricted within the BDP Specific quantum’s of space are set out within the AAP which are beyond that set out in the BDP B8 uses are referred to in the BDP Offices within the AAP must support and compliment the high technology sector Development densities are highly prescriptive.</p>	<p>Representations to the BDP contest the appropriateness of RIS generally and its impact on employment delivery. The AAP and BDP policy combine to create a detailed range of prescription which only serves to constrain delivery and reduce flexibility for occupiers and this has a detrimental affect on the delivery of development at Longbridge as part of the RIS.</p>

<p>Policy H2 Residential and associated community and local retail uses on the former East Works site 700 dwellings</p>	<p>No corresponding policy in the BDP</p>	<p>This part of the AAP falls within Bromsgrove District and therefore it is not appropriate for the BDP to reference it</p>	<p>The amount of housing proposed at Longbridge within the BDP includes some of the AAP which falls within Bromsgrove District including this site allocation. Longbridge still represents a significant opportunity for new housing development. Housing has not however been delivered in those locations such as the new Local Centre as envisaged in the AAP due to changing market conditions and the significantly reduced market for apartments which was anticipated for the Local Centre.</p>
<p>Proposal T9 – Car Parking Standards specifically set out for Longbridge in accordance with AAP Appendix Proposal OS4a West Works Neighbourhood Park – A public neighbourhood park either side of the River Rea that meets Green Flag standards of quality. Note also Appendix 3 of the AAP – Car Parking Standards</p>	<p>9.52 – Reference is made to the City Council’s SPD on car parking including its parking standards</p>	<p>The levels of car parking within the BDP with reference to the SPD are more generous in terms of provision than the AAP</p>	<p>The level of car parking allowable at Longbridge in line with policy is more restrictive within the AAP than the BDP. This makes development less attractive to the market at Longbridge than elsewhere in the City where a greater level of parking can be provided. This parking standards at Longbridge have a direct and negative impact in attracting occupiers and have a detrimental impact on development delivery.</p>
<p>Proposal OS12 Public art strategy will be prepared for approval. Public art should be an integral part of the public realm and buildings in key locations particularly in the new local centre, the new parks and at the public transport interchange (including street furniture, bridges, art on buildings, lighting, sculpture, surface treatments etc</p>	<p>No policy</p>	<p>The requirements for public art at Longbridge are not reflected in general policy now within the BDP</p>	<p>Longbridge incurs public art as an additional development cost and it has an impact on delivery as a consequence</p>
<p>4.12 – S106 requirements; 35% affordable housing Securing provision of community, library,</p>	<p>Policy TP30 applies to affordable housing, but other s106 requirements of the AAP are not specifically set out in the</p>		

<p>health, recreation and cultural facilities with the Austin Building in the Local Centre Requirement for affordable business space 15 year open space and local centre management plan</p>	BDP		
<p>4.13 – Longbridge Infrastructure Tariff – Table of community infrastructure improvements to be funded through LIT (Table 2;) and include improvements to; Longbridge railway station Rail services and infrastructure Bus service improvements Education and childcare Public art Open space, recreation and visitor facilities Walking cycling and ecology mitigation Employment and training agreement Business support Safer communities Sports development Lifelong learning Community cohesion Heritage and culture Sustainable transport, travel Planning Prospects Administrative costs for monitoring s106 agreements and LIT Rates set for all developments including all employment uses B1, B2 and B8, A1 retail uses, housing including affordable housing, D1 and D2 uses as well as other uses not defined</p>	<p>10.14 – Community Infrastructure Levy – The city council is putting in place a CIL to support the delivery of the growth required in the BDP.</p>	<p>The Longbridge Infrastructure Tariff will not be CIL compliant when CIL is introduced or earlier subject to enactment of CIL Regulations. A number of aspects of the LIT are not in any event CIL compliant and were set out before the CIL Regulations and the introduction of the planning obligation tests into statute.</p>	<p>In the BDP stating that development at Longbridge “will be brought forward in line with policies in the AAP” it is unsound in directing development decisions to a plan which is now out of date and not consistent with the NPPF or statute.</p>
<p>4.17 Development Phasing – Specific phasing set out for the delivery of employment and housing – Key delivery to date includes 1060 dwellings to be constructed to April 2015, RIS on West Works Phase 1 complete and Phase 2 underway with entire RIS completed 2019+</p>	<p>No references to phasing delivery at Longbridge</p>	<p>The AAP contains greater prescription</p>	<p>The prescription set out in the AAP is not now in line with events which have occurred on the ground.</p>

<p>Appendix 1 – Lists those Development Plan policies which are superseded by the AAP.</p>	<p>There is no similar list within the BDP which lists policies in the BDP which supersede policies in the AAP</p>	<p>The BDP is not consistent in this approach.</p>	<p>The absence of a list leads to confusion as to which policy takes precedent when conflicts occur.</p>
<p>EZ2 – Nanjing – Site is allocated for Nanjing (now MG Motors UK Ltd) for uses within B1b and c, B2 and B8. Surplus land is recognised to be likely to become available and this surplus land will be considered for new uses within the context of the overall aims of the AAP and adjoining land uses</p>	<p>TP18 and TP19 – Core Employment areas – Areas to be retained in B1b and c, B2 and B8 uses. Exceptional justification required to support other uses outside of these uses. Land safeguarded unless non conforming or it meets the tests set out in the loss of employment land SPD</p>	<p>The likelihood of surplus additional land was always expected and additional flexibility is already allowed for in the AAP to support the wide objectives of the AAP</p>	<p>The regeneration of additional surplus land from MG Motors could be constrained by the additional application of Policy TP19 over and above that in the AAP which already allows some flexibility for the redevelopment of surplus land.</p>