



# **Report to Birmingham City Council and Bromsgrove District Council**

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

## **REPORT ON THE EXAMINATION INTO THE LONGBRIDGE AREA ACTION PLAN DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 28 March 2008

Examination hearings held between 14 & 22 October and on 4 December 2008

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## **1 Introduction and Overall Conclusion**

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
  - a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document;
  - b) whether it is sound.
- 1.2 This report contains my assessment of the Longbridge Area Action Plan DPD in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act.
- 1.3 I am satisfied that the DPD meets the above-mentioned requirements of the Act and Regulations. My role is also to consider the soundness of the submitted Longbridge Area Action Plan (LAAP) against the tests of soundness set out in Planning Policy Statement 12 (PPS12). When the LAAP was submitted, PPS12: *Local Development Frameworks* 2004 was in force. However, it was replaced in Summer 2008 by PPS12: *Local Spatial Planning*. The examination was in progress prior to publication of the new PPS12, and representations were sought in terms of the tests of soundness set out in the early version, so that my assessment began with a consideration of the nine tests.
- 1.4 However, PPS12 (2008) paragraphs 4.51 & 4.52 provide that, to be "sound", a DPD should satisfy three tests; it should be justified, effective and consistent with national policy. Although the tests of soundness, which I must now consider, are presented in a different and more simple way, they cover the same matters as before. Justified means that a DPD should be founded on a robust and credible evidence base, and the most appropriate strategy when considered against the reasonable alternatives. Effective means that the DPD should be deliverable, flexible and able to be monitored. Spatial planning objectives for local areas should be aligned not only with national and regional plans, but also with shared local priorities set out in Sustainable Community Strategies. National policy emphasises the importance of spatial planning, requires local planning authorities (LPAs) to produce a Statement of Community Involvement and follow its approach, and to undertake proportionate sustainability appraisal. PPS12 (2008) confirms that the rigour of the examination process remains unchanged and Inspectors will be looking for the same quality of evidence and content as before.
- 1.5 In line with national policy, the starting point for the examination has been the assumption that the local authority has submitted what it considers to be a sound plan. The changes I have specified in this binding report are made only where there is a clear need to amend

the document in the light of the legal requirements and/or the tests of soundness in PPS12 (2008). None of these changes should materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.

- 1.6 My report firstly considers the legal requirements, and then deals with the relevant matters and issues considered during the examination in terms of testing justification, effectiveness and consistency with national policy. My overall conclusion is that the Longbridge Area Action Plan is sound, provided it is changed in the ways specified. The principal changes which are required are, in summary:
- Changes to phasing and timetabling to ensure that the plan is capable of delivery over the plan period, but with allowance for the current economic downturn;
  - Changes to the proposed "community infrastructure levy" to clarify that a tariff system consistent with ODPM Circular 05/2005: Planning Obligations (formulae and standard charges) is intended.
- 1.7 This report sets out all the detailed changes required, including those suggested by the Councils, to ensure that the plan meets the legal requirements and tests of soundness. Appendix 1 lists the changes in detail which are required to make the DPD sound, and Appendix 2 lists minor changes to which I do not object, and which would help to give greater accuracy and clarity. References in ( ) refer to core documents in the examination library.

## **2 Legal Requirements**

- 2.1 The LAAP is referenced within both Birmingham City Council's and Bromsgrove District Council's updated Local Development Schemes, as a strategy to guide the regeneration of the former MG Rover site and adjoining land. The schemes were approved in March 2008 (CDs 4.7 & 4.34) and show the LAAP as having a submission date of February or March 2008.
- 2.2 Bromsgrove District Council's Statement of Community Involvement (SCI) was found sound by the Secretary of State and was formally adopted by the Council in September 2006, before the examination began (CD4.1). Birmingham City Council's Statement of Community Involvement was adopted in April 2008, before the examination hearings took place (CD4.20). It is evident from the documents submitted by the Councils, including the Regulation 28, 31, 32 and 33 Statements and their Self Assessment Paper, that the Councils have met the requirements for consultation as set out in the Regulations.
- 2.3 The Councils' Position Statement No1 (CD8.25) details the consultation exercises which were conducted from the Issues and

Options stage onwards (Table 1). It is clear to me that these measures went far beyond the minimum requirements. The Councils described steps taken to target residents of Frankley and engage them in the consultation process. I have seen no substantive evidence that Frankley was disadvantaged or that interested persons were unable to obtain details of the emerging plan for Longbridge.

- 2.4 Alongside the preparation of the DPD it is clear that the Councils have carried out a parallel process of sustainability appraisal (CDs 1.4, 1.6, 2.9, 2.10, 2.14-2.16 refer).
- 2.5 A screening exercise, forming Stage 1 of a Habitats Regulations Assessment was undertaken, and this concluded that (i) any effects of development in the LAAP area would be unlikely to extend significantly beyond the LAAP boundary, and (ii) that the nearest European protected site is approximately 15kms away. I agree that, as a result of the screening exercise carried out (CD2.8), there is no need for an Appropriate Assessment [Habitats Directive].
- 2.6 The LAAP has been submitted before the Core Strategies for either Birmingham City Council or Bromsgrove District Council. The thrust of PPS12 is that Core Strategies should be produced by every local planning authority to define the overall vision and strategic objectives for their area as well as a delivery strategy. The Core Strategy should make clear spatial choices about where development should go in broad terms, so that the work of any subsequent DPD is reduced. Core Strategies should be produced in a timely fashion. In this case, the LAAP has been prepared ahead of the Core Strategies for either authority, and it seems to me that this is different from the plan-making process described in PPS12. However the sudden closure of the MG Rover plant in 2005 with the loss of 6,500 direct jobs and impact on a supply chain employing an estimated 27,000 people was a devastating blow for local people and the West Midlands' economy. I accept that these events required an immediate and positive response from the LPAs, in order to stimulate the regeneration of the area and address the needs of the local community. In these unusual circumstances, I consider that it was entirely appropriate to submit the LAAP as early as possible even though this preceded the Core Strategies. I am satisfied that the DPD has had regard to national planning policy on this point.
- 2.7 The West Midlands Regional Assembly has indicated that the DPD is in general conformity with the West Midlands Regional Spatial Strategy (RSS). Regional Spatial Strategy incorporating phase 1 was approved in January 2008, and Phase 2 Revision – Draft (Preferred Option) was published in December 2007. I consider that the LAAP is in general conformity with the approved RSS as well as the emerging Phase 2 changes (CD5.19 & CD5.24).

- 2.8 The LAAP makes a number of cross references to the Community Strategies for Bromsgrove, Worcestershire and Birmingham (eg. Pages 17, 19 and 27) and it is clear that the document has had regard for them (CDs4.10, 4.11, 4.18 & 4.21).
- 2.9 I am satisfied that the LAAP complies with the specific requirements of the 2004 Regulations including the publication of the prescribed documents; availability of them for inspection and local advertisement; notification of DPD bodies and provision of a list of superseded saved policies. Accordingly, the legal requirements have been met.

### **3 Justified, Effective and Consistent with National Policy Tests**

#### ***Introduction***

##### *3.1 The main issues are*

- 1 Whether the AAP can achieve the economic transformation of Longbridge which it seeks, developing a range of employment opportunities across the site and establishing a Regional Investment Site (RIS) which is attractive to high profile investors.
- 2 Whether the proposed new mixed use local centre is appropriate in terms of the prevailing pattern of shopping centres in South Birmingham and Bromsgrove, and whether it would provide a new heart for future residents and workers of the Longbridge area.
- 3 Whether the proposals for new housing provision are the most appropriate in the circumstances and are evidence based, and will lead to the creation of sustainable and mixed communities with high quality housing.
- 4 Whether the transportation strategy adequately supports the DPD's other proposals, represents the most appropriate in the circumstances, is founded on a robust credible evidence base and is likely to be effective.
- 5 Whether the AAP is sufficiently focused on implementation, sets out clear mechanisms for delivery and monitoring and is flexible enough to deal with change.

#### ***Issue 1 – The economic transformation of Longbridge***

- 3.2 The LAAP explains that the MG Rover car plant was once the heart of a vibrant community, and that many local people wish Longbridge to recover its vibrancy. The vision for the area as stated in Part B of the LAAP begins "Longbridge will undergo major transformational change redeveloping the former car plant and surrounding area into an exemplar sustainable, employment led mixed use development for the benefit of the local community,

Birmingham, Bromsgrove, the region and beyond.....". Theme 3 of the LAAP is to achieve an economic transformation securing economic diversification and business growth which would provide 10,000 jobs and a long-term sustainable environment.

- 3.3 Draft Planning Policy Statement 4: Planning for Sustainable Economic Development (PPS4) states that local planning authorities should plan positively to encourage economic growth. They should aim to secure a good range of sites for economic development and mixed-use development, and a good supply of land and buildings for large and small businesses as well as start-up firms, with high quality and inclusive design. They should avoid or mitigate adverse impacts on the environment, and promote sustainable travel choices. The early construction of the Innovation Centre providing flexible space for businesses and new, larger units at the Cofton Centre demonstrate a willingness of the developers and public authorities to work together and be proactive in promoting economic development. I consider that the LAAP is consistent with emerging national policy in draft PPS4.
- 3.4 The approved RSS defines Major Urban Areas (MUA) as the main foci for development and investment. Three high technology corridors are identified in Policy PA3, and the proposed RIS at Longbridge would fit in the first corridor, the Birmingham to Worcestershire Central Technology Belt (CTB). The Longbridge site, within the Birmingham MUA, would satisfy the criteria in Policy PA7 of the RSS. Paragraph 7.38 of the emerging Phase 2 Revision to the RSS refers to the proposed RIS at Longbridge.
- 3.5 The Regional Development Agency (Advantage West Midlands) considers that the LAAP is in general conformity with the West Midlands Economic Strategy (WMES). I accept that the submitted LAAP should explain more fully the early contribution to economic regeneration made by the Rover Taskforce. This can be achieved by adding text to the Foreword of the LAAP. I agree that there are insufficient references to the WMES, an important strategic document, but this could be overcome by additional wording to Objectives 9, 10, 11 and 12 of the DPD. I recommend that these additions are made.
- 3.6 The target of 10,000 new jobs at Longbridge was initially set by the MG Rover Task Force in 2005. At Issues and Options stage, plan options were put forward which would have yielded more or fewer jobs, with different mixes of land uses. Following consultation and sustainability appraisal, the option in the submitted DPD emerged as the most suitable alternative. It is supported by both Councils and the other major stakeholders including the landowners. I have had regard for the argument that the allocations for the RIS and H1 housing area fail to make the most effective use of land and result in a minimum-sized RIS of 25has. An alternative configuration of land uses has been put forward for a larger RIS, but this would remove business uses from the section of Bristol Road South west

of Lickey Road. I accept that this provides an important gateway to Longbridge along which business uses rather than residential uses would be most appropriate. Neither the Government Office for the West Midlands nor the Regional Assembly has criticised the size of the intended RIS.

3.7 The Employment Land Baseline Study (CD3.7) provides evidence on employment land availability, market conditions, socio-economic factors and the local policy context for the LAAP. Assessments of the submitted AAP indicate that the target of 10,000 jobs could be achieved by some 5,200 jobs at the RIS, 1,200 at Nanjing, 1,400 on other employment sites and 2,300 in the local centre. Studies of employment density, masterplanning by St Modwen the principal landowner, and data from Nanjing Automobile Corporation (NAC) provide support for these figures and indicate that they are feasible. I conclude that the economic strategy is justified, being founded on a robust and credible evidence base and being the most appropriate when considered against the alternatives.

3.8 Turning to the likely effectiveness of the economic strategy, regeneration, especially in areas where manufacturing industry was dominant for many decades as in Longbridge, is never easy to secure. However, the LAAP includes a number of objectives and proposals which in my view should help to realise its ambition for an employment led, mixed use development. These include:

- Protecting land for general industrial use, notably on the NAC site and at the Cofton Centre;
- Developing a Regional Investment Site (RIS) attractive to high profile investors and high technology businesses;
- Accommodating a learning quarter for a college/educational facility (Bournville College) in order to help raise skill levels locally;
- Supporting a local culture of enterprise by, among other things, providing affordable flexible business space;
- Providing opportunities for a variety of long-term jobs in high technology, general industry (Proposal EZ1), office, leisure and retail activities.

3.9 The Regional Employment Land Study monitors the implementation of policies in the RSS. Development on RIS sites in the West Midlands varied between 2000 and 2007, with completions for the research and development/ high technology sector (Use Class B1b) slowing down in recent years. The Regional Employment Land Study noted that completions would need to increase in future years in order to achieve diversification of the economy. In the current economic climate, it may be difficult to attract suitable occupiers of a new Longbridge RIS in great numbers and as quickly as was first envisaged. However, with Birmingham Business Park substantially developed and with demand shifting in favour of sites which are close to shops and conference facilities, a new RIS with appropriate ancillary space at Longbridge should be attractive to new or re-locating businesses in the medium or longer term.

- 3.10 The West Midlands Economic Strategy identifies a range of existing business sectors exhibiting strong potential for future growth, advising that these are addressed by the region's "priority business clusters". However, Advantage West Midlands is content that the LAAP has not attached a specific theme or business cluster to the RIS; to have done so might have discouraged some potential investors. It argues that there should be more emphasis on the type and aspiration of the business or investor and less on the products of the company. Experience of delivery at the Major Investment Site in Ansty has shown that securing an anchor tenant in order to give identity, reality and credibility to the site, and not sub-dividing plots for speculative development, were among the factors critical to success. It seems to me that the LAAP would allow a similar approach to be followed at Longbridge.
- 3.11 Proposal RIS1 in the LAAP makes clear that the RIS should offer a prime location for technology led business (use classes B1b and B1c), but should permit some B1a and B2 uses, as well as space for services for staff and business use. I consider that the proposal correctly seeks to limit the amount of non B1b/c floorspace in order to ensure that high quality technology and research and development businesses are pre-eminent. B1a uses should only be supportive of the high technology activities and this is essential, in my view, to avoid conflict with RSS policies which seek to direct office floorspace away from out-of-centre locations and towards town and city centres. I accept that a maximum of 25,000 sqm of such office space, permissible under Proposal RIS1, would be proportionate. I am also content that up to 10,000 sqm of , meeting and conference, hotel, crèche, gym and small scale retail facilities would enhance the character of the RIS but would not undermine the proposed new local centre. Overall, the balance of land uses should enable a technology led business park to be secured whilst providing sufficient flexibility in a challenging market and having regard for the current economic downturn.
- 3.12 Continuing the work of the MG Rover Task Force, I am advised that there is a robust and well-resourced network of partnerships in South-west Birmingham dedicated to skills' programmes and business support for local people and businesses. The LAAP includes provision for a Learning Quarter, and Bournville College is on track to relocate to the site at Longbridge with an opening date in 2011 . The CTB, referenced in paragraph 1.22 and 3.85 of the LAAP, brings together key stakeholders including the Universities, Chambers of Commerce and Councils, which should assist in delivering the RIS. The main developers are supportive of the approach, and the Innovation Centre is already in operation. Table 6 of the LAAP (Pages 60-61) lists key performance indicators, information sources and responsible bodies for all the relevant proposals for employment, learning and economic development. I am satisfied that these are clear and thorough, and note that a number of these have been regularly used and tested for other



economic strategy documents. In my view, the proposals for the future economy of Longbridge are effective, meaning that they are deliverable, flexible and able to be monitored.

- 3.13 Overall, I conclude that the LAAP should enable the economic transformation of Longbridge which it seeks, developing a range of employment opportunities across the site and establishing a RIS which is attractive to high profile investors. The DPD is sound providing the following changes are made:

**Page 1, Foreword – add new sentences to explain the origin, character and function of the MG Rover Task Force.**

**Extend the following in order to explain links to the West Midlands Economic Strategy, as detailed in Appendix 1:**

**Page 12, Objective 9, paragraph 2.27**

**Page 13, Objective 10, paragraph 2.31**

**Page 13, Objective 11, paragraph 2.34**

**Page 13, Objective 12, paragraph 2.36**

### ***Issue 2 – New Mixed Use Local Centre***

- 3.14 Objective 12 of the LAAP is to create a sustainable mixed-use centre for Longbridge which meets local needs and establishes a distinctive sense of place and a heart for the community. Planning Policy Statement 6: Planning for Town Centres (PPS6) expects retail, leisure and related development to be focused in existing centres in order to strengthen and, where necessary, regenerate them. The network and hierarchy of centres should be considered by regional planning bodies and LPAs. At paragraphs 2.7 and 2.53-4, PPS6 acknowledges that new centres may be designated through the plan-making process, in areas of significant growth or where deficiencies are identified in the existing network. The document also states that LPAs should adopt a positive and proactive approach to planning for the future of all types of centres within their areas. I consider that the LAAP is consistent with national policy for town centres in that the Councils are taking a positive approach. They are planning for a new centre in an area which is expected to grow significantly in terms of new housing and employment provision, and within an area where Birmingham Local Centres Strategy, 2006 (CD4.25) indicated a gap in local centre provision.
- 3.15 The upper tiers of the network and hierarchy of centres are defined in the RSS as Birmingham city centre (tier 1) and Redditch (tier 4). Bromsgrove District Local Plan (CD4.15) sets out a hierarchy, with

Bromsgrove town as the "main shopping location". It is difficult to identify the hierarchy from Birmingham's UDP. The pattern and ranking for the city is more clearly set out in CD4.25. Although the latter does not form part of the adopted development plan, it has been adopted by a Council Cabinet. Its hierarchy is underpinned by studies of shopping and other services. Northfield represents a town centre, or very significant district centre in PPS6 terms, with Rubery and Cotteridge being other district centres. Local centres are located in Frankley, Rednal and West Heath.

- 3.16 The Councils in conjunction with major stakeholders commissioned a study which led to the 'Centre designation, retail and centre uses justification and evidential support' statement in 2006 (CD3.1). This reported on a detailed quantitative assessment of retail capacity for 4 options for Longbridge and was backed by a household survey of shopping behaviour in the wider area. Its conclusions, that the levels of convenience and comparison retail and leisure development over the plan period in the LAAP could be supported, attracted negligible criticism. An Update of Baseline Retail Analysis, November 2007 (CD3.22) confirmed the main conclusions of the earlier analysis.
- 3.17 PPS6 makes clear that new town centre development should be appropriate in scale, and I am mindful that the Government Office of the West Midlands was highly supportive of the Area Action Plan, but commented that the intended levels of office and retail floorspace were at the upper limit. Proposal LC1 would permit up to 8,500sqm gross of comparison retail floorspace (including comparison floorspace within the superstore), which would be below the threshold set in Policies PA11 and PA13 of the RSS for non-food retailing outside the strategic centres. Regarding impact on existing centres, and taking account of the proposal for a superstore of up to 7,500 sqm gross, the studies in CD3.1 and 3.22 suggest that the effect on the existing town/district centre at Northfield would not be significantly adverse. Neither would other district and local centres be harmed by the proposals for Longbridge, including Frankley, where the Councils provided information on independent, ongoing work to renovate the existing shopping centre.
- 3.18 Whilst the new local centre would have a relatively high level of impact on Morrisons' foodstore at Great Park, this lies outside a defined centre where planning policy would provide protection. Like other neighbouring foodstores, it is reported to be trading above its company average and would not therefore be likely to cease trading as a result of the new local centre at Longbridge.
- 3.19 The LAAP currently includes references to "supermarket" which, having regard to the use of terms in PPS6, Annex A, Table 3, should read "superstore". I recommend changes to achieve consistency with national policy.

- 3.20 Proposal LC1 would permit leisure uses up to 5,000 sqm and office (B1a) uses up to 10,000 sqm. Policy PA11 of the RSS would expect development of these sizes to be accommodated in the strategic centres (Birmingham City or Redditch). However, the Regional Assembly has raised no objection to the proposal, noting the support for the new local centre from Birmingham, Worcestershire and Bromsgrove Councils who are satisfied that the LAAP would not detract from the implementation of Policy PA11. The Regional Assembly also observed that Longbridge is highly accessible by public transport, a key factor for the location of new centres.
- 3.21 It seems to me that the relatively large scale of the proposed new local centre can also be justified on the grounds that a new centre would have to have the critical mass to appeal to new customers and establish itself within the current hierarchy of centres. In addition, the community which has lost the MG Rover Works requires a new heart which a significant, well designed new shopping and service centre could provide. Furthermore, within the context of the mixed use development, this proposal would assist economic regeneration, by enabling cross-subsidy for some less profitable uses and by creating some 2,300 new jobs.
- 3.22 Provision is also made in the LAAP for "The Austin" – described as "a heritage and mixed use community building (including space for heritage, healthcare, community uses and social enterprises)". The Councils recognise that further detailed work is required with the developers and local community to promote this facility. Some uses will need to generate income in order to cross-subsidise others which offer a community service. It seems to me that "The Austin" is an important element of the proposals for the local centre as it affords real opportunity for continuing community involvement, both in expressing preferences and in inclusive decision-taking, in order to meet community needs and achieve local distinctiveness.
- 3.23 I agree that attention should be given to the best mechanism to secure ongoing community involvement, and that a Community Development Trust (CDT) could assist in securing an empowered voice for local people, and greater self-reliance with independence from local authorities, agencies and other bodies. However, it seems to me that the LAAP should not impose a CDT, as its formation should be an initiative from local people. A CDT would then need to develop a role which would be consistent with existing community organisations. I am satisfied that the plan would not rule out the formation and development of a CDT in Longbridge. In these circumstances, Tables 5 and 6 need not refer to implementation and monitoring by a CDT.
- 3.24 Policy DS1 of the LAAP setting out design principles for all development is, in my opinion, essential if the development is to achieve high quality in terms of its appearance and compatibility with its context, and if it is to be sustainable in terms of improving access by non-car means and reducing the carbon footprint. I am

advised that some 30% of Birmingham's resident households do not own cars and in these circumstances the common assumption that "everyone shops by car" has to be questioned. From a journey along the A38 from the city centre to the junction with the M5, it is apparent that the major food retailers in the past have favoured a prominent site beside this main road, and have been less concerned with contributing to good urban design, an attractive streetscene or active frontages for passing pedestrians. The Proposals Map shows an area beside the railway and south of Longbridge Lane as the local centre retail quarter. I see no reason why a superstore of the expected size should not be highly visible in this location to passers-by, whilst achieving good design and complying with Policy DS1.

- 3.25 The employment zone, EZ1, would separate the local centre from the NAC site and provide a buffer to any nuisance from the automotive works. I consider that this, combined with attention to detailed design and layout, should secure a high quality centre. Policy DS1 reflects national policy in PPS1, especially paragraph 36 which exhorts authorities to prepare robust policies on design and access, and Planning for Town Centres: Guidance on Design and Implementation Tools. I consider that the policy requirements in the LAAP, especially for large floorplate buildings, should be kept, although an explanation of 'active frontages' in the glossary could improve the effectiveness of the policy.
- 3.26 The LAAP notes on Page 25 that the local community supports the protection /preservation of existing local centres and neighbourhood parades. One such group of shops exists at Rednal along the Bristol Road South. Permission for a new Aldi foodstore on the north side of this road was refused on appeal in February 2008 (App/P4605/A/07/2047819) (CD7.1). I consider that new retail development should be concentrated in the proposed new centre at Longbridge and fragmentation avoided. I see no need for the LAAP to provide for a new foodstore on this stretch of Bristol Road South.
- 3.27 The Government has signalled that it intends to make changes to PPS6, a consultation document having been published in July 2008. As yet, it is unclear exactly how national policy will be revised, but I have identified no serious conflict with the thrust of emerging changes. I conclude that the LAAP is consistent with national planning policy for town centres.
- 3.28 I conclude that the proposals for a new local centre in the AAP are underpinned by a robust evidence base and are justified. Table 5 presents a Summary Implementation Plan, and the Council advised that this programme for the local centre is being implemented, albeit there has been some slippage with start on site delayed to 2009. With minor changes to the phasing and timetable in Table 5, I am satisfied that the LAAP meets the test for effectiveness. I conclude that the proposed new mixed use local centre is appropriate in terms of the prevailing pattern of retail and district or

local centres in South Birmingham and Bromsgrove, and should provide a new heart for the Longbridge community.

3.29 The LAAP should be changed as follows to make it sound:

**Policy DS1, paragraph 3.23, 5<sup>th</sup> bullet; paragraph 3.26, 2<sup>nd</sup> bullet; paragraph 3.52, 1<sup>st</sup> bullet and Table 3 – references to “supermarket (s)” should be deleted and replaced with “superstore.”**

**Appendix 4 – Glossary of terms – Add**

- **“Superstore – Superstores are self-service stores selling mainly food, or food and non-food goods with more than 2,500sqm trading floorspace.”**
- **Active frontage – Active frontages are frontages with main doors and windows – including glazed store frontages – at street level adjoining the public realm and highways to allow activity, natural surveillance and overlooking.”**

***Issue 3 – Housing***

3.30 Planning Policy Statement 3: Housing (PPS3) seeks a step change in housing delivery, through a new more responsive approach to land supply at the local level. The LAAP seeks to achieve high quality housing and a mixed community. Housing would be provided on previously developed land at a variety of densities, all above the national indicative minimum of 30 dwellings per hectare. At Issues and Options stage (CD1.1), the Councils put forward alternative land use scenarios, the first of which would have resulted in no new housing but would have retained the plan area's former use for employment purposes. The submitted LAAP, however, reflects a strategy which would deliver a minimum of 1,450 new dwellings to help meet existing and future housing needs and create a sustainable, mixed use community (Objective 13 of the LAAP). New housing at Longbridge would have good accessibility to new jobs at the RIS and EZ sites, to community facilities in the new local centre, to enhanced infrastructure and services including public transport.

3.31 I have had regard to the fact that the H2 housing site would adjoin the Green Belt and countryside to the south. The land for future housing was previously occupied by car works, and sustainability appraisal has assessed the impact of the proposed change of use. The LAAP provides a number of objectives and proposals to protect open space and wildlife interests, and I am satisfied that pedestrian

access onto Cofton Church Lane and the North Worcestershire Path from the housing area would not be damaging. Moreover, it would be beneficial to future residents. The Councils have put forward a minor change to the wording of paragraph 3.105 of the LAAP to ensure that very high density development does not abut the open countryside. I consider this to be reasonable to protect the character and appearance of the wider area, and recommend that the change be made.

- 3.32 For reasons given in paragraph 3.6 above, I see no need for a reconfiguration of the H1 housing site. The Proposals Map shows that most of the housing would be set well back from Bristol Road South and would adjoin the new area of open space beside the River Rea. This should make it attractive to future occupiers.
- 3.33 Reasonable alternatives to the chosen strategy have been examined and I consider that the submitted AAP has pursued the most appropriate one. In addition, I consider that the thrust of the policies for housing provision is closely in line with PPS3.
- 3.34 The RSS seeks to move from the recent position of 2 houses built outside the Major Urban Areas (MUAs) to 1 within them, and to increase the level of housing development in MUAs. Development at Longbridge would count towards the total for Birmingham as the site has been and remains functionally part of the city, and would not be counted towards Bromsgrove's housing figures. The draft Phase 2 Revision to RSS clarifies this point. The Councils have put forward a minor change to emphasise this point which assists with justification, and I support it. The Regional Assembly commented that the H2 proposal does not conflict with Policy CF3(C) of the RSS; both local authorities are in agreement, and it represents a pragmatic example of 'good planning'.
- 3.35 The Longbridge development will make an important contribution to Birmingham and the Region's future housing provision, as set out in Table 1, and to Housing on Previously Developed Land, Table 3 of the RSS. There is evidence that the LAAP might realise more than 1,450 new dwellings. Clearly, if this could be achieved within the sites allocated for housing and without detriment to the quality of the environment or placing an undue strain on available infrastructure, this would be beneficial.
- 3.36 Studies of the accommodation needs of Gypsies and Travellers have been undertaken for Bromsgrove District, and jointly for Birmingham, Coventry and Solihull Councils. Longbridge is not seen as a suitable location for gypsy and traveller accommodation by these studies, and I see no conflict with RSS Policy CF5(F).
- 3.37 The housing trajectory (Table 4 of the LAAP) was prepared jointly with the principal landowner in late 2007, and following discussion with development experts. The rates are comparable with completions on other large housing schemes in the region.

However, given the recent downturn in the housing market, although clearance and remediation works are underway, the targets for 2009/10 now look uncertain. I consider that the trajectory should be altered to make allowance for this, and recommend accordingly.

- 3.38 Objective 14 of the LAAP aims for a mix of types, size and tenure of new homes including affordable housing. Proposals LC1, H1 and H2 seek to include 35% affordable housing. The RSS supports the provision of affordable housing through Policy CF5 but does not provide a numeric target. The draft Phase 2 Revision states that local authorities should aim, through their plans and strategies, to provide 6,000 affordable units (gross) each year. The indicative annual average figure for all housing in the Region is shown in Table 1 of the draft RSS, as 18,280. Whilst the target of 35% affordable housing was described by the Regional Assembly as within the same "ballpark" as figures in the draft RSS, I need to be satisfied that it is underpinned by robust evidence relating to housing need and to economic viability.
- 3.39 On housing need, the Housing Baseline Report (CD3.21) provides a useful overview of housing policy, housing condition and key issues for the LAAP. It also considers the housing market within SW Birmingham and N Worcestershire, informing that in every part of Birmingham, people on average earnings and with no existing housing equity, are unable to buy 'the average home' (without committing to potentially unsustainable mortgages). Modelling suggested that around 16,000 new affordable and social dwellings were required between 2004/5 and 2008/9.
- 3.40 Findings from a Strategic Housing Market Assessment 2007 for Birmingham were published in February 2008 (CD3.35). This concluded that there is a clear requirement for additional affordable homes with 4 or more bedrooms. There would be no need for smaller affordable units if these were delivered, but the study stated that this is most unlikely to happen. Taking a pragmatic approach and having regard to the Council's clearance programme, gross housing need for the next 5 years was calculated at 58,572 dwellings with a balance of 1, 2, 3 and 4+ bedroom properties required. Overall, the study concluded the City's future net housing requirement for the next 5 years to be 25% intermediate housing and 15% social rented housing (40% in total).
- 3.41 A Strategic Housing Market Assessment for the South Housing Market Area in 2007, which includes Bromsgrove District, recognised that Bromsgrove is one of the most expensive places to purchase housing within Worcestershire. Housing Vision, a Housing Market Assessment for the District, was completed in October 2008, confirming that there is a very high level of need for affordable housing. In particular, 71% of single person households of people under 35 years of age would be unlikely to afford owner occupation.

- 3.42 Although the above studies may not have informed early stages of preparation of the LAAP, I consider that their conclusions provide support on grounds of local need for a target of 35% affordable housing at Longbridge.
- 3.43 PPS3 paragraph 29 expects Local Development Documents to set an overall planwide target for affordable housing which, among other things, reflects an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing.
- 3.44 The 35% target is consistent with that of an early Affordable Housing SPG (2001) from Birmingham City Council and its Unitary Development Plan (UDP) (CD4.2). The latter defined targets for two types of affordable housing: A - for housing provided by an organisation such as a registered social landlord or local authority which is allocated on the basis of need, a target of 25% applies; B - for low cost market housing available in perpetuity, a target of 10% applies. The UDP was adopted in 2005, and its definitions of affordable housing are very close to those in the more recent PPS3 for social rented and intermediate housing.
- 3.45 The Councils provided evidence from six sizeable sites in south-west Birmingham where affordable housing had been secured through s106 agreements since 2002. Four of the six sites had achieved 34% or 35% affordable housing, lending support to the notion that this target is achievable.
- 3.46 Birmingham City Council undertook a Strategic Housing Land Availability Assessment (SHLAA) in 2007. This included an examination of some 50 sites across the city, which were compared in terms of likely gross development value and development costs, in order to calculate residual values. The study classified sites according to ability to provide affordable housing, placing Longbridge within the "larger middle market sites" category. On these sites, 35% was judged to be appropriate subject to specific site considerations. Because of Longbridge's large scale and the potential to raise the overall value of the area, it was considered that 35% should be attainable. Following viability modelling in Bromsgrove, the draft Core Strategy sets a target of 40% affordable housing for the District.
- 3.47 In addition, viability modelling work for the LAAP has been undertaken which includes assumptions that 35% of new housing would be affordable (CDs 3.20, 8.3-8.5). A modest assumption about funding from the Housing Corporation, modified to make allowance for meeting the construction costs to secure Level 4 rather than Level 3 of the Code for Sustainable Homes, was included. The model indicated that 35% affordable housing would be reasonable for Longbridge over the long term and based on normal market conditions. Sensitivity testing of the model showed



that varying market conditions, reduced grant and varying the proportions of social rented and intermediate housing would make a considerable difference to residual values. As the LAAP does not specify exactly how affordable housing (whether social rented or intermediate) is to be provided, it offers flexibility.

- 3.48 The Councils have proposed changes to emphasise that site specific characteristics and market conditions may affect the exact number of affordable houses that can be provided on each site. Negotiations not just the 35% target will determine the outcome. I consider that these changes are necessary to make the document sound and are consistent with Circular 05/2005: Planning Obligations. I am satisfied that the affordable housing target is adequately supported by appropriate economic viability assessment. Providing the following changes are made, I conclude that the housing proposals are the most appropriate, are evidence based and should foster sustainable and mixed communities with high quality housing.

**Page 32, paragraph 3.102, add after the first sentence "The scheme is intended to help meet the housing needs of the Major Urban Area, and as such any residential development will be counted towards development targets for the MUA and not Bromsgrove."**

**Page 32, paragraph 3.105, third sentence should read "Density to be 40-50 dwellings per hectare across the whole site but responding to the differing character across the site."**

**Page 23 and subsequently, paragraphs 3.33, 3.93, 3.102, 3.105 and 4.11 – revised wording to state that 35% is a target (not a minimum or an absolute figure) for affordable housing.**

**Page 52, Table 4, Longbridge Housing Trajectory should be changed as detailed in Appendix 1.**

#### ***Issue 4 – Transport***

- 3.49 Planning Policy Guidance Note 13: Transport (PPG13) defines its objectives as to integrate planning and transport in order to promote more sustainable transport choices, to promote accessibility to jobs, shopping, leisure and other services by public transport, walking and cycling and reduce the need to travel especially by car. I consider that the LAAP achieves a high degree of integration between transport and land use/ other aspects of spatial planning, which stems from collaborative work from an early stage between the transport authorities, the Councils and the major landowners. The parties should be commended for their approach. Proposals T1–T4 outline a transport strategy which recognises the

importance of accessibility on foot, by bicycle and public transport, consistent with sustainable choices and PPG13.

- 3.50 The West Midlands Regional Assembly, Birmingham City Council, Worcestershire County Council and Centro confirmed that the plan is in general conformity with the RSS. Whilst some schemes identified in the West Midlands Local Transport Plan (2006) (CD5.27) are not promoted in the LAAP, these were assessed at the issues and options stage. Public consultation was carried out before decisions to exclude the schemes were taken. I consider this to have been reasonable.
- 3.51 The transport proposals in the LAAP are underpinned by a number of related technical studies which contribute to a robust evidence base. These include a Travel Demand Model (CD3.13), Traffic Modelling Report (CD3.11), Bus and Rail Strategies (CDs3.14 & 3.15), Travel Management Strategy (CD3.12) and Infrastructure Strategy (CD3.16). Necessarily, these include a range of assumptions and variable data inputs, but I am satisfied that the methodologies and coverage were entirely appropriate. I consider that the studies provide a sound base for planning new infrastructure and transport improvements in the Longbridge area.
- 3.52 I have taken account of the criticism that public consultation was not sufficiently wide for all local people to understand the transport issues. In particular, it is suggested, they were unaware of the Bus and Rail Strategy documents until late in the process. However, I am satisfied that the requirements for consultation have been met in respect of the LAAP, and I am aware that relevant options for infrastructure were published in the Issues and Options Report dated Oct 2006. In addition, representations received at submission stage relating to the transport proposals reflect a good understanding of the issues.
- 3.53 Proposals T8, T10, T13 and T14 in the LAAP provide for improvements to the highway network to support future travel demand, in the context of pursuing a sustainable movement strategy. There was general agreement that, in principle, these improvements would be required. However, the leading developer expressed concern as to how the policies would be applied, and what new infrastructure would be deemed necessary to support specific developments. It was argued that extant travel demand from the existing use of the land for employment purposes; shifts in mode split and background traffic growth which could be different in practice from the assumptions used in modelling; and existing problems at some road junctions should be allowed for when developer funding was sought.
- 3.54 Table 1 in the LAAP includes various highway improvements and indicates that these will be provided by way of s278 agreements. The transport authorities acknowledged that a more detailed delivery programme would follow in due course, and that potential

public sector support for key infrastructure proposals such as realignment of the A38 (from the Regional Funding Allocation) may be forthcoming. Following an adjournment of the hearing sessions, more meetings between the Councils, transport agencies and the developer were held, and further work on viability modelling was carried out. This led to a re-assessment of transport schemes and agreement that some £10m could be cut from the sum of £58.65m for transport infrastructure which had first been estimated.

- 3.55 There are ongoing programmes of transportation works to support the West Midlands and Worcestershire Local Transport Plans, and it is estimated that some public investment will be available to cover schemes in the Longbridge area. However, it is difficult to be precise at this stage as to the full extent of public funding. It is commendable, in my view, that the LAAP has pinpointed the existing and likely future problems on the local highway network, looked at possible and preferred solutions and has estimated the costs of resolution. However, the precise level of contributions under s278 for individual developments cannot be realistically specified and I consider that change to the heading to Table 1, as proposed, would help to make this clear.
- 3.56 Proposal T14 promotes offsite improvements to the motorway network at M5 Junction 4 and where necessary at M42, Junctions 1 and 2. The Highways Agency has worked with the Councils to reach an agreed position, on the basis of traffic modelling and assessment, as to what mitigation measures will be needed to deal with traffic from a regenerated Longbridge on the motorways. The Highways Agency had to satisfy itself that, following implementation of the LAAP proposals, conditions on the motorways would not deteriorate so much that capacity would be exceeded and safety impaired. I support changes to the map on Page 37 and to the text to clarify the extent of works required by Proposal T14 as these should aid delivery of the plan. However, the LAAP need go no further in specifying the exact details of future mitigation measures. The Local Network Management Scheme is expected to deliver some improvement to the M5 Junction 4 in the near future, but I accept that the LAAP cannot be too precise about funding.
- 3.57 I consider that the options for improved public transport links between Frankley and Longbridge have been fully investigated in an objective way. I agree with the transport authorities that the advantages of a bus-based solution are considerable and outweigh the potential benefits of reinstating the rail link. The bus option offers better penetration of residential areas in Frankley and within the LAAP area than a rail service, with the scope to provide more stops; reduced capital cost and annual operating costs; minimum land take and less severance of the LAAP area; more certainty and more rapid delivery. In addition, emerging rail strategy favours improvements to the Cross City line corridor, with which reinstatement of the Frankley branchline would not be compatible. In my opinion, Proposal T4, which would enable a new high quality

bus service to and from Frankley, is not expedient and short-sighted but represents a positive element of the AAP which should improve communications with the Frankley area.

- 3.58 Proposals T5, T6 and T7 promote a new public transport interchange on Longbridge Lane, improvements to Longbridge rail station and a strategic park and ride site. I have considered whether these proposals are sufficiently ambitious and represent the best alternative to 'showcase' regeneration in the Longbridge area. The proposals reflect a holistic approach to provide a "Transport Hub" having had regard for all types of users, and emphasising the need for high quality, attractive and well-designed facilities. The proposed scale of facilities is underpinned by baseline transport studies. The Longbridge Strategic Park & Ride report (CD3.30) demonstrated that a maximum of 865 vehicles could be expected to use the site, which with 1,000 spaces available would give surplus capacity of 14%. However, it was suggested that experience of new car parks for park and ride at Selly Oak and Tame Bridge Parkway stations was that they soon became overcrowded. Modelling had not picked up these effects. Excessive demand for parking at Longbridge could be harmful, causing significant congestion and unwanted parking in the surrounding area. The Councils proposed a change to Proposal T7 which would allow more than 1,000 car parking spaces for Park & Ride, and I support it.
- 3.59 Paragraph 3.140 of the LAAP ensures that the feasibility of moving the park and ride site and the railway station to the south of Longbridge Lane will continue to be examined. Options for improving rail services were assessed in the Rail Strategy (CD3.15) which suggested that relocation of the rail station should be considered after 2019. Relocation would require significant capital expenditure, moving the entire signalling system which I am advised is most unlikely until after the end of the plan period, and realigning the tracks. Network Rail will be considering an extension of the 4 tracks south of Longbridge to Barnt Green in the longer term, and if that were found feasible, that might be the best time to review moving the station and park and ride facility. In these circumstances, I am satisfied that the approach in the LAAP is realistic and flexible.
- 3.60 The transport authorities contend that the future level of passenger demand for an additional rail station at Cofton Hackett would be unlikely to offset the associated costs, and I see no reason to disagree. The rail strategy does not recommend rail freight facilities to serve the NAC site, but it would not preclude their development alongside the cross city mainline.
- 3.61 Paragraph 2.13 declares that the AAP "sets ambitious targets to achieve a significantly higher proportion of journeys on foot, by cycle and by public transport ....". The desired mode shift will depend on the delivery of the good infrastructure, walking and

cycling networks and improved public transport services which the LAAP promotes. In addition, Proposal T11 provides for a package of measures and a Travel Co-ordinator to encourage changed behaviour and more sustainable travel. I am satisfied that regard has been had to experience elsewhere and best practice guidance on Travel Plans in drafting this proposal.

- 3.62 Proposal T9 describes car parking provision and Appendix 3 includes parking standards, which are more stringent (meaning that the maximum levels are lower) than those given in PPG13 but derived from a draft supplementary parking document of Birmingham City Council. PPG13 advises that LPAs may adopt more rigorous standards than those set out in its Annex D, and I consider that the LAAP is consistent with national policy on parking. The authorities' judgment is that the standards strike a balance between meeting parking demand and achieving the proposed mode shift target for Longbridge. I am satisfied that the plan through its baseline studies has had sufficient regard for the travel needs of staff and students at the proposed college.
- 3.63 This major mixed use development is certain to increase traffic levels locally (an additional 4,800 vehicle trips in the peak hours is expected), and Proposal T15 on traffic management could be very significant in safeguarding the environment of residents and rural areas from pollution or other traffic nuisance. The Councils have admitted that Lickey Road south of Lowhill Lane should not be classified as a Primary Movement Route. I agree and recommend that changes should be made to the Proposals Map and Movement Strategy Plan.
- 3.64 As to whether the LAAP is "effective" in PPS12 terms, it provides significant information regarding the delivery of the transport improvements, which have the support of all main transport authorities and operators. It is clear that preliminary work to secure implementation has been undertaken or is underway. For example, the West Midlands Passenger Transport Authority agreed in January 2008 to promote a 'busway' scheme to Frankley. Preliminary cost estimates for improvement works are given in the supporting Infrastructure Report (CD3.16). Tables 1 and 2 of the LAAP specify scheme requirements, phasing and funding mechanisms. These have been criticised as being too prescriptive and lacking necessary flexibility. Given recent economic changes which have affected financial markets and building programmes, I consider that it is realistic to revise the information on phasing in those tables to make the LAAP both deliverable and flexible. The necessary changes are detailed in Appendix 1.
- 3.65 I conclude that the transportation strategy more than adequately supports the DPD's other proposals, represents the most appropriate in the circumstances, and is founded on a robust and credible evidence base. Provided the following changes are made, it will also be effective.

**Page 20-21 Proposals Map – change so as not to show Lickey Road as a Primary Movement Route**

**Page 46, Table 1 and paragraph 4.8 – change the heading to: “Anticipated s278 Scheme Requirements”, and delete dates for implementation from the table.**

**Page 37, Change the heading to: “Longbridge Area Action Plan Movement Strategy Plan”; Change Lickey Road to Secondary Movement Route; add “Groveley Lane/Lowhill Lane” to the T8-J Improvements; show J4 on M4 improvement and not M5/M42 J.**

**Paragraph 3.141, Proposal T7 – change first bullet to read “at least 1000 spaces for park and ride users only.”**

**Paragraph 3.148, Proposal T14 – delete “where necessary” and insert in its place “improvements to traffic signals at ...”**

### ***Issue 5 – Delivery***

- 3.66 PPS12 explains that area action plans should deliver planned growth areas, stimulate regeneration and focus the delivery of area based regeneration initiatives, among other things. I consider that the LAAP has an appropriately strong emphasis on implementation and delivering necessary change at Longbridge. Part D of the LAAP is devoted to Delivery and Implementation. As the Councils pointed out, the emphasis on delivery in the plan exceeds that in many AAPs which have been adopted elsewhere. It is clear from the hearing sessions and written evidence that there has been continuing collaboration between the landowner/developers and Councils, as well as with infrastructure providers, directed at delivering the plan. Evidence on the ground, in the form of clearance of the old MG Rover sites and construction of new business premises at the Innovation Centre and Cofton Centre, demonstrate that an “action” plan is intended and not just a paper document.
- 3.67 Paragraph 4.9 of PPS12 describes the components of good infrastructure planning. Although this guidance is intended primarily for core strategies, it seems to me that the principles are equally relevant to the LAAP. Regarding infrastructure needs and costs, the Councils’ Viability and Baseline Study (CD3.20) itemised the infrastructure needs of the plan and attributed costs to them, which were derived from detailed and specialist baseline studies.
- 3.68 Viability work supporting planning applications and carried out by the developers post-dated this early work for the LAAP, took account of some actual costs and reflected more recent market conditions. New viability modelling was undertaken in November

2008 during an adjournment of the hearing sessions which incorporated new findings from the developers. Revised figures for construction works and infrastructure costs were input. The resultant figure for total outgoings was about 2% lower than the original figure in CD3.20, with costs for some elements (eg transport infrastructure) going down and others (eg pre-construction) going up. I consider that the approach to identifying infrastructure needs and costs was sound, and that this has been confirmed by the more recent review of the model.

- 3.69 Part D of the submitted LAAP contains a series of tables which indicate the phasing of development in terms of dates and linkage to other proposals. For example, proposed improvements to junctions on the motorway are phased for 2013-14 and linked to completion of the local centre. I consider that this reflects good practice to achieve "joined up" development and the delivery of necessary infrastructure at the most appropriate time. However, the recent downturn in the economy means that development is unlikely to occur in line with the specified dates. The LAAP is insufficiently flexible in the current economic climate and the presence of so many dates in the tables in Part D is unsound. The Councils have, however, put forward changes to the tables deleting or changing dates and making minor word changes. These, in my opinion, make the phasing more realistic and introduce the required level of flexibility to make the plan sound. I recommend that these changes to Tables 1,2,4 and 5 and to paragraph 4.17 be made.
- 3.70 The LAAP refers to a number of funding sources to deliver the regeneration and transformation of the area. As already described, s278 of the Highways Act 1980 and negotiations between the developers and highways authorities, would be used to secure funding for the schemes listed in Table 1 of the plan. Planning obligations under s106 should provide a range of community and infrastructure measures, notably affordable housing, as described in paragraphs 4.5-4.6 and elsewhere. The Councils proposed a late change to add a reference at the end of paragraph 4.6 to planning conditions. I support this change and consider it necessary, as it secures compliance with national policy on the use of conditions in preference to obligations, where possible.
- 3.71 The plan explains that planning contributions will be split into two elements: a traditionally negotiated s106 obligation and a Community Infrastructure Levy (CIL). The proposed CIL generated significant opposition from representors including key stakeholders. It had not been included in Issues and Options or Preferred Options reports for the LAAP, and its introduction at submission stage was seen as contrary to the spirit of "front loading". The Planning Bill introduced the concept of CIL, and PPS12 includes a reference at paragraph 4.12, but national policy has not yet clarified how it should operate; more information and regulations are expected in 2009. In view of these factors, I consider that the submitted LAAP is unsound in its references to use of a CIL.

- 3.72 However, a local area-based funding mechanism for Longbridge would help deliver the large scale infrastructure required for its successful regeneration. Use of standard charges would provide an element of certainty for developers, minimise the time spent on negotiating s106 obligations and improve equity and transparency in the funding process. Circular 5/2005 supports pooled contributions and formulae and standard charges. The Councils identified a number of other LPAs which had developed standard charge schemes, and I consider that the approach could usefully be employed to help deliver the LAAP. The Councils have proposed changes to the plan to avoid reference to the CIL, and rename it the Longbridge Infrastructure Tariff (LIT). I consider that this would overcome part of the unsoundness in the submitted document, and I recommend that the change is made.
- 3.73 Table 2 of the LAAP identifies a wide range of infrastructure schemes for funding from the LIT. Regarding the tests in Circular 05/2005, I am satisfied that these schemes are all reasonably related to securing the comprehensive redevelopment and regeneration of Longbridge. I see no reason why LIT contributions should not be used to realise them. The Councils have carried out a considerable amount of work to ensure that the LIT mechanism will work. A Memorandum of Understanding between the local authorities has been drafted to provide advice on planning applications. Much effort has gone into quantifying the total tariff which would be required to fund the schemes in Table 2, to considering a delivery plan and banking function, and into the timing and phasing of payments.
- 3.74 The land at Longbridge is largely owned and being developed by just two parties; these relatively unusual circumstances, in my opinion, mean that the arrangements to deliver the AAP should be practicable in this case, even if they cannot be replicated elsewhere. Change to paragraph 4.13 and a new 4.16a have been tabled to provide a fuller explanation of the delivery mechanisms. I endorse the changes as they contribute to the plan's effectiveness.
- 3.75 Table 3 of the LAAP shows how the LIT funds would be raised from the various elements of new development, based on a charge per new dwelling and the quantity of new floorspace for other uses. The Councils advised that they had compared the tariff rates with amounts negotiated through s106 agreements for other developments in the area to ensure that they were fair and reflected local experience. They had also reviewed similar schemes and tariff levels/charge rates developed by other English LPAs. The Councils emphasised that all developers would pay, whether their schemes came forward in years 1 or 15. They proposed a new paragraph 4.22a which would allow some variation of the tariffs and payments over time, in order to respond to market conditions. On the basis that this change is made, I consider that Table 3 is clear, transparent and fair and is sound.



- 3.76 Bournville College of Further Education saw the levy or tariff as a good mechanism in principle, but argued that it was inappropriate to apply the charges to a non-commercial college. I recognise its status as a registered charity, and accept that its relocation to Longbridge is to be funded largely from public resources. However, I consider that its staff and students will have an impact on the local area in terms of placing pressure on public transport, roads, open space and recreation facilities, heritage and cultural and local community safety services. It seems appropriate that it should be covered by the LIT. I am advised that other public sector funded projects in Birmingham have contributed towards the infrastructure and mitigation measures needed to support their development. It will always be difficult to set a tariff which will be fair to everyone, but as the rate for the College is at the lowest level in Table 3, I am satisfied that it is reasonable. As explained above, changes to the LAAP will enable all developers, including the College, to negotiate revised terms if the LAAP policies would make a scheme unviable.
- .....
- 3.77 The Councils have tabled changes to paragraph 4.15, in response to concerns about the requirement that payment should be expected as soon as planning permission was granted. Permission does not mean that development will definitely take place, nor does it trigger the need for supporting infrastructure. I accept that, in the current economic climate, there may be delay between consent and implementation. For these reasons, I am satisfied that the change to paragraph 4.15 is needed in the interests of effectiveness.
- 3.78 Concerns were raised about the assumptions made in the original viability modelling exercise for public sector funding, in particular investment by Advantage West Midlands. In November 2008, following fresh discussions with the agency and St. Modwen, the model was re-run. This showed that based upon Net Present Values (NPV) approximately £30m additional public funding would be required. The Councils provided evidence of ongoing work to secure more public funding from a number of different sources (CD8.33). The plan runs for some 15 years and I accept that funding this far ahead can rarely be guaranteed. Given the overall scale and value of development and the significance to the region of regenerating Longbridge, I am satisfied that it should be possible to plug the apparent "gap", especially if the role of banker is extended to help identify new funding opportunities. Additional references to public sector funding in paragraphs 4.2, 4.3, new 4.4a,4.8, 4.10, Table 5 and a new appendix with information about some key sources, would help to make the plan sound on this important point.
- 3.79 The LAAP was prepared during a period of market buoyancy. As it is some 16 years since the country last faced such an economic downturn, it is perhaps unsurprising that the plan did not make allowance for the conditions which the development industry now faces. I agree that the LAAP should be assessed in terms of its

deliverability over the full plan period, and that the momentum of regeneration and development should be sustained by exercising some flexibility in the early years at planning application stage. Care needs to be exercised to ensure that the principles of the employment-based, mixed use strategy are not compromised, and that potential planning harm from development is satisfactorily mitigated. Nevertheless, I accept the need for flexibility to ensure that the plan is deliverable. I therefore support and recommend changes to the existing text, as well as a new paragraph 4.22a, which have been put forward by the Councils following discussions with the major stakeholders to inject more flexibility.

- 3.80 Table 5 of the LAAP identifies responsible bodies, delivery mechanisms and the sources of delivery funding. In my view, with amendments, this provides clear information as to the responsibilities for delivery of each of the main proposals in the plan. Table 6 sets out the monitoring requirements for each AAP Theme and Objective, identifying key performance indicators and information sources. I am satisfied that the arrangements are consistent with the requirements for monitoring core strategies outlined in PPS12. Since annual monitoring would enable any deviation from the plan to be quickly identified, I consider that the reference in paragraph 4.29 of the plan to a strategic review after 5 years is reasonable. Providing the following changes are made, I conclude that the AAP is sufficiently focused on implementation, sets out clear mechanisms for delivery and monitoring and is flexible enough to deal with change.

**Page 45 onwards, paragraphs 4.2, 4.3, new 4.4a, 4.8, 4.10 and Table 5 and a new Appendix 5 – add references to public sector funding, or make clear that the public sector is included.**

**Page 45, paragraph 4.6, add a reference to refer to the use of planning conditions.**

**Add a new paragraph 4.16a describing a delivery plan, as detailed in Appendix 1.**

**Add a new paragraph 4.22a to explain that a flexible approach will be adopted to make allowance for market conditions, as detailed in Appendix 1.**

**Contents page, paragraphs 3.6, 3.16, 3.41, 3.67, 3.84, 3.99, 3.111, 3.119, 3.126, 4.7, 4.10, 4.11, 4.12, 4.14, Tables 2 and 3, and Glossary delete "Longbridge Community Infrastructure Levy (CIL)" and replace with "Longbridge Infrastructure Tariff (LIT)".**

**Pages 46 onwards, paragraph 4.17 and Tables 1,2,4,5 – change dates and descriptions as shown in Appendix 1.**

**Page 45 onwards, paragraphs 4.2, 4.3, 4.5, 4.6, 4.7, 4.10, 4.12, 4.13 and title to Table 2 – change wording to enable greater flexibility in the application of proposals.**

**Page 51, paragraph 4.13 – add text to refer to the banking function as detailed in Appendix 1.**

**Page 51, paragraph 4.15 – delete the figures for residential and non-residential payments and replace them with the figures shown in Appendix 1.**

### ***Other matters – water and flood risk***

- 3.81 According to Planning Policy Statement 25: Development and flood risk (PPS25), LPAs should prepare and implement planning strategies that help to deliver sustainable development by appraising, managing and reducing flood risk. A risk-based approach should be used and flood risk assessment carried out to the appropriate degree at all levels of the planning process. There are two watercourses which cross the plan area, the River Rea to the north and River Arrow to the south. The LAAP refers to opening up both Rivers. A strategy to address water and flooding issues is described in 3.11, and Proposals OS2 and OS4 relate to the establishment of walkways/cycleways and new neighbourhood parks beside the Rivers.
- 3.82 Regarding the River Rea, the Environment Agency's indicative flood map puts parts of the Longbridge site within flood zones 2 and 3a where there would be a medium or high risk of flooding. Flood Risk Assessment was undertaken in connection with the 2003 and 2004 planning applications for Longbridge West car parks and for the Technology Park. That work pre-dated PPS25, although I was advised that the flow analysis and method of calculation complied with current standards. A full flood risk assessment (fluvial) was completed in 2008 by the two main developers (CD7.8a)
- 3.83 Although the work on flood risk assessment has not been carried out exactly in line with national policy, I was advised that a partnership approach had been taken with the developers, their technical advisors and the Environment Agency. The River Rea through Longbridge has been culverted for many years but the intention is to reinstate much of it and regrade the land after removal of the huge buildings and areas of hard surfacing, formerly associated with MG Rover. Once the majority of the River has been opened up, new areas of open space will be provided alongside, benefiting local people and ecology. Flood attenuation measures and SUDS are proposed in the LAAP, and it has been recommended that finished floor levels be set at least 600mm above the 100 year plus climate change flood level. The Environment Agency is

supportive of the development proposals which are expected to reduce the flood risk along this watercourse and create a more attractive environment.

- 3.84 For the River Arrow, the Environment Agency's indicative floodplain map showed no flooding through the AAP site. The site was shown within PPS25's flood zone 1 with less than a 1 in 1,000 annual probability of river flooding. A flood risk assessment accompanied the outline planning application for housing development (Proposal H2 in the LAAP) on the former East Works industrial site (CD7.10a). A strategic flood risk assessment has recently been carried out for Bromsgrove District Council. Results were not published at the time of the hearings although I was informed that the assessment showed no major flooding problems with the River Arrow. CD7.10a concluded that the proposed channel works would not result in any out of bank flooding through the site. It is unlikely that the proposed development would place itself or any other parts of the catchment at increased risk of flooding.
- 3.85 I have had regard for concerns that development at Longbridge and opening up the River Arrow could have a detrimental effect on the quantity and quality of water reaching the Upper Bittell reservoir. I recognise that the River is largely culverted from Cofton Reservoir to Upper Bittell and does not carry water all year round. It seems to me that the flow of water is largely a maintenance matter and need not be addressed further in the LAAP. The Environment Agency raises no objection and I have seen no evidence that the proposed development at Longbridge would be harmful to the reservoirs or this stretch of the River.
- 3.86 In conclusion, although the LAAP is not underpinned by its own flood risk assessment as expected by PPS25, I am satisfied that the plan would not increase the risk of flooding in the study area or more widely. It includes a site wide strategy to address water and flooding issues. The objective to open up the two Rivers is supported by the Environment Agency and should be beneficial to the environment. I consider that additional text in paragraph 3.172 would explain that the approach to flooding has been credible and robust. In line with PPS12, paragraph 8.1, the Proposals Map should show areas at risk of flooding (1:100 years), and I recommend that this is changed accordingly.

### ***Other matters – sustainable development***

- 3.87 Part C of the LAAP outlines a Sustainability Strategy setting out standards and principles to be achieved. Longbridge is to become an "urban eco-centre". I consider that the thrust of the approach is consistent with PPS1. The Council has proposed some additions to the text to clarify that the zero carbon target is set for 2016 and subsequent dates, and that energy demand assessments should accompany the site-wide strategies under Proposal S2. A new section heading and paragraph covering sustainability appraisal

would refer to the West Midlands Sustainable Planning Checklist. Changes to Table 6 are also proposed in order to aid future monitoring of sustainability. I consider that these changes would reinforce the strategy, making it more compliant with regional policy, and should be made to improve the LAAP's effectiveness.

### ***Other matters – Policing***

- 3.88 West Midlands Police Authority argued that the Area Action Plan's Table 2 should be more specific than merely summarising measures to secure safer communities, and should refer to "the capital costs of policing". At the hearing, the Police Authority sought to go further stating that it sought commitment in the LAAP for the provision of a police base funded by the intended new development. I was advised that the Police Authority had been a statutory consultee for the plan, so that I would have expected it to have made the case for capital funding more precisely and at a much earlier stage in plan preparation. Relevant planning policy documents including the RSS, Birmingham Sustainable Community Strategy and Birmingham's emerging Core Strategy - Issues and Options recognise the need for a safer city and crime reduction. However, they do not require a new police base at Longbridge.
- 3.89 Table 2 of the plan refers to the roll out of local anti-crime and disorder projects, and neighbourhood policing. It does not therefore rule out support for enhanced police facilities. The Councils pointed out that the local centre will provide a full range of community facilities and services, and a police base could be considered for inclusion in the Austin Centre. Moreover, Table 2 does not differentiate between capital and revenue funding. I consider that there is no need to provide additional details of the community projects nor the mechanisms which should attract funding, such as neighbourhood policing. I conclude that the LAAP provides appropriately for safer communities and neighbourhood policing, and no changes are required in respect of this matter.
- 3.90 In conclusion, the following changes are needed to make the LAAP sound:

**Page 16, paragraph 3.10, bullet point 7, amend as follows:  
"Include an energy statement, energy demand assessment, and associated data on CO2 emissions ...."**

**Page 16, after paragraph 3.15, add new Proposal DS2 on Sustainability Assessment, as detailed in Appendix 1.**

**Table 6 should include monitoring requirements for Objective 2, Sustainable Buildings & Infrastructure – see Appendix 1.**

**Pages 20-21, The Proposals Map should be changed to show areas at risk of flooding (1:100 years).**

**Page 44, proposal OS14, paragraph 3.172 – extend the text to provide additional information on flood risk, as detailed in Appendix 1.**

**Page 15, paragraph 3.4, add to the end of the first sentence "...by 2016 and beyond in subsequent phases."**

**Page 16, paragraph 3.10, first bullet, add "...low carbon development with a target of zero carbon by 2016 and beyond in subsequent phases."**

### ***Minor Changes***

3.91 The Councils wish to make several minor changes to the submitted DPD in order to clarify, correct and update various parts of the text. Although these changes do not address key aspects of soundness, I endorse them on a general basis in the interests of clarity and accuracy. These changes are shown in Appendix 2. I am also content for any very minor alterations relating to typographical errors or paragraph/page numbering to be made.

### **4 Overall Conclusions**

4.1 I conclude that, with the amendments I recommend, the Longbridge Area Action Plan satisfies the requirements of s20(5) of the 2004 Act and meets the tests of soundness in PPS12.

*Jill Kingaby*

INSPECTOR

## **ABBREVIATIONS**

AAP	Area action plan
(CD)	Core document – in the examination library
CDT	Community development trust
CTB	Central technology belt
DPD	Development plan document
LAAP	Longbridge Area Action Plan
LDF	Local development framework
LPA	Local planning authority
MUA	Major urban area
NAC	Nanjing Automobile Corporation
NPV	Net Present Value
PPS	Planning policy statement (issued by the Government)
RIS	Regional investment site
RSS	Regional spatial strategy
WMES	West Midlands Economic Strategy

## APPENDIX 1

The following changes are required to make the Longbridge Area Action Plan sound.



## Foreword

<b>Information Sources (exam docs)</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (New Text is Underlined)
Schedule of Minor Changes October 2008 - Additional Supporting Material Advantage West Midlands 24/002	Foreword section of AAP- Page 1. New sentence to be added to end of the third paragraph		<u>In the aftermath of the closure, the MG Rover Task Force was set up and allocated a £170m support package targeted at former MG Rover employees, suppliers and dealers and the wider community. The Task Force (a strong partnership of key organisations including Advantage West Midlands, Birmingham City Council, LSC, Job Centre Plus, GOWM, DTI, trades union, local MPs and a number of community groups and other organisations) was successful in minimising the impacts on the local community and regional economy and was commended by central government for its response.</u>

## PART B: Vision, Themes and Objectives

<b>Information Sources</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (New Text is Underlined)
Schedule of Minor Changes October 2008 - Additional Supporting Material Advantage West Midlands 24/001	Objective 9 - Paragraph 2.27 (p.12)	This objective is in line with policy in the Regional Spatial Strategy to provide a RIS in the A38 High Technology Corridor.	This objective is in line with <u>the West Midlands Economic Strategy (WMES) Objectives 2.1 (Birmingham Competing as a Global City) and 2.3 (Sustainable Management and Utilisation of Land and Property Assets)</u> as well as policy in the <u>Regional Spatial Strategy to provide a RIS in the A38 High Technology Corridor.</u>
Schedule of Minor Changes October 2008 - Additional Supporting Material Advantage West Midlands 24/001	Objective 10 – Paragraph 2.31 (p. 13). New sentence to be added to the end of the paragraph.		2 <u>At a strategic level, this objective is also supported through a number of WMES Strategic Objectives, including 3.3 (Driving up Ambition and Aspiration), 3.4 (Skills for Employment &amp; Enterprise) and 1.6 (Stimulating Employer Investment in Skills &amp; Training).</u>
Schedule of Minor Changes October 2008 - Additional Supporting Material Advantage West Midlands 24/001	Objective 11 – Paragraph 2.34 (p.13). New sentence to be added to end of the paragraph.		<u>This business objective is also supported through the WMES Strategic Objectives 1.3 (Creating Economically Sustainable New Businesses) and 1.8 (Stimulating Innovation, Creativity and Knowledge Generation).</u>
Schedule of Minor Changes October 2008 -Additional Supporting Material Advantage West Midlands 24/001	Objective 12 – Paragraph 2.36 (p.13). New sentence to be added to the end of the paragraph.		<u>This Objective is also supported through various strategic objectives in the WMES including 2.5 (Developing Sustainable Communities) and 2.6 (Regenerating our Most Deprived Communities).</u>

## Part C, D and Appendices

<b>Information Sources</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (New Text is Underlined / PreviousText Scored Through)
Schedule of Minor Changes October 2008 - Minor amendments and corrections	References to Longbridge Community Infrastructure Levy: Contents page and paras: 3.6, 3.16, 3.41, 3.67, 3.84, 3.99, 3.111, 3.119, 3.126, 4.7, 4.10, 4.11, 4.12, 4.14, Table 2 sub-heading, Table3 heading, Glossary of terms to be amended to clarify terms	Longbridge Community Infrastructure Levy CIL	<del>Longbridge Community Infrastructure Levy (CIL)</del> <u>Longbridge Infrastructure Tariff (LIT)</u>

## PART C: LONGBRIDGE SITE PLANS AND PROPOSALS

<b>Information Sources</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (Changes are underlined / Previous Text Scored Through)
Schedule of Minor Changes October 2008 - Additional Supporting Material Advantage West Midlands 24/003	Paragraph 3.4 (p.15)	Longbridge will become an 'urban eco-centre'- an exemplar quality development that targets zero carbon	Longbridge will become an 'urban eco-centre' – an exemplar, quality development that targets zero carbon <u>by 2016 and beyond in subsequent phases.</u>
Schedule of Minor Changes October 2008 - Additional Supporting Material Advantage West Midlands 24/003	Paragraph 3.10 – Energy and Climate Change (p.16). First Bullet point	Minimise carbon emissions and achieve a site-wide low carbon development.	Minimise carbon emissions and achieve a site-wide low carbon development <u>with a target of zero carbon by 2016 and beyond in subsequent phases.</u>
Schedule of Minor Changes October 2008 - Additional Supporting Material Advantage West Midlands 24/004	Paragraph 3.10 – Energy and Climate Change (p.16). Bullet point 7	Include an energy statement, and data on CO2 emissions generated by new and existing developments and ongoing management and monitoring arrangements.	Include an energy statement, <u>energy demand assessment and associated</u> data on CO2 emissions generated by new and existing developments and ongoing management and monitoring arrangements.

<b>Information Sources</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (Changes are underlined / Previous Text Scored Through)
Schedule of Minor Changes October 2008 –Additional Supporting Material Advantage West Midlands 24/004	Proposal DS1 after para 3.15 (p.16) – New Section Heading and Paragraph  (Subsequent renumbering of paragraphs also required)		<b><u>'Sustainability Assessment'</u></b>  <u>□3.16 The submission of a sustainability assessment with the first outline planning applications based upon the West Midlands Sustainable Planning Checklist. This on-line tool helps developers and others assess to what extent site proposals will deliver a wide range of economic, social and environmental sustainability priorities. The checklist has been developed by the West Midlands Regional Assembly with a range of regional and national partners (including Advantage West Midlands) and can be accessed at <a href="http://www.checklistwestmidlands.co.uk">www.checklistwestmidlands.co.uk</a>.</u>
Schedule of Minor Changes October 2008 - Representation no 12/006 RPS o.b.o ASDA stores	Policy DS1 Para 3.23 (p.18). 5 <sup>th</sup> bullet point	Large floorplate buildings where inactive frontages are likely (e.g. supermarkets, car parks, leisure uses etc)	Large floorplate buildings where inactive frontages are likely (e.g., <u>supermarkets</u> <u>superstore</u> , car parks, leisure uses etc).
Schedule of Minor Changes October 2008 - Representation no 12/006 RPS o.b.o ASDA stores	Para 3.26 (p.22) 2 <sup>nd</sup> bullet point	A retail quarter focussed on a range of shop and service units including a new supermarket.	A retail quarter focussed on a range of shop and service units including a new <u>supermarket</u> <u>superstore</u> .
Affordable Housing Minor Changes Paper – 14 October 2008	Paragraph 3.33, 6 <sup>th</sup> bullet point (p.23)	A range of residential units (approximately 400 dwellings) to include 35% affordable housing. New homes will also be encouraged to meet the Lifetime Homes Standard, allowing homes to be accessible for all including young, old, single, families, non-disabled or disabled.	A range of residential units (approximately 400 dwellings) to include <u>a target of 35% affordable housing</u> . New homes will also be encouraged to meet the Lifetime Homes Standard, allowing homes to be accessible for all including young, old, single, families, non-disabled or disabled.

<b>Information Sources</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (Changes are underlined / Previous Text Scored Through)
Schedule of Minor Changes October 2008 - Representation no 12/006 RPS o.b.o ASDA stores	Para 3.52 1 <sup>st</sup> bullet point (p.25)	Retail uses including a well designed supermarket or superstore and smaller units at the ground floor suitable for retail uses	Retail uses including a well designed <del>supermarket</del> <u>or superstore</u> and smaller units at the ground floor suitable for retail uses.
Affordable Housing Minor Changes Paper – 14 October 2008	Paragraph 3.93 (p.31)	The site (6 hectare) will be developed for a minimum of 350 dwelling houses (Class C3) comprising a mix of sizes, types and tenures. It will include 35% affordable housing of a mix of types and sizes. Affordable housing to be spread across the site. Density to be in the region of 50-60 dwellings per hectare. New homes will also be encouraged to meet the Lifetime Homes Standard, allowing homes to be accessible for all.	The site (6 hectare) will be developed for a minimum of 350 dwelling houses (Class C3) comprising a mix of sizes, types and tenures. It will include <u>a target of 35% affordable housing</u> of a mix of types and sizes. Affordable housing to be spread across the site. Density to be in the region of 50-60 dwellings per hectare. New homes will also be encouraged to meet the Lifetime Homes Standard, allowing homes to be accessible for all.
Affordable Housing Minor Changes Paper – 14 October 2008 / Schedule of Minor Changes to the AAP – October 2008 (Representation No. 516 / 009 CPRE)	Paragraph 3.102 (p.32)	The site presents an opportunity to provide a range of housing, which reflects projected demand including a minimum of 35% affordable housing. The existing neighbourhood centre and public transport facilities will be improved and enhanced to serve the development and new shops, services and community facilities provided.	The site presents an opportunity to provide a range of housing, which reflects projected demand including <u>a minimum of target of 35% affordable housing. The scheme is intended to help meet the housing needs from the Major Urban Area, and as such any residential development will be counted towards development targets for the MUA and not Bromsgrove.</u> The existing neighbourhood centre and public transport facilities will be improved and enhanced to serve the development and new shops, services and community facilities provided.

<b>Information Sources</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (Changes are underlined / Previous Text Scored Through)
Affordable Housing Minor Changes Paper – 14 October 2008 / Schedule of Minor Changes to the AAP – October 2008 (Representation No. 516 / 011 CPRE)	Paragraph 3.105, 1 <sup>st</sup> bullet point / The third sentence of Paragraph 3.105 should be replaced (p.32)	Dwelling houses (Class C3) a minimum of 700 dwellings with a mix of sizes types and tenures across the site. 35% of dwellings to be affordable. Density to be a minimum of 40 dwellings per hectare across whole site but responding to the differing character across the site. New homes will also be encouraged to meet the Lifetime Homes Standard, allowing homes to be accessible for all; including young, old, single or in families, non-disabled or disabled.	3 Dwelling houses (Class C3) a minimum of 700 dwellings with a mix of sizes types and tenures across the site. <u>A target of 35%</u> of dwellings to be affordable. <del>Density to be a minimum of 40 dwellings per hectare</del> <u>Density to be 40-50 dwellings per hectare</u> across the whole site but responding to the differing character across the site. New homes will also be encouraged to meet the Lifetime Homes Standard, allowing homes to be accessible for all; including young, old, single or in families, non-disabled or disabled.
Schedule of Minor Changes October 2008 -Minor amendments and corrections	Movement Framework Plan (p.37) Amend title		<del>Movement Framework</del> The plan title should be <u>Movement Strategy Plan</u>
Additional Minor Changes to the AAP relating to Transportation – November 2008	Movement Framework Plan (p.37)	Plan shows Lickey Road as part of Primary Movement Route/Strategic Highway Network	Change Lickey Road to Secondary Movement Route.
Minor Schedule of Changes October 2008 - Minor amendments and corrections	Movement Framework Plan (p.37)		The plan should include the proposed Junction Improvement access point at the intersection of Groveley Lane and Lowhill Lane; this is an error in the current figure.

<b>Information Sources</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (Changes are underlined / Previous Text Scored Through)
Minor Schedule of Changes – October 2008 Minor amendments and corrections	Movement Framework Plan (p.37) Inset Plan on Wider Area Improvements Proposal T14		Delete improvement shown at junction of M5/M42 and show improvement at M4/Junction 4. Use different symbol to distinguish for these improvements and add reference to them in key.
Additional Minor Changes to the AAP relating to Transportation – November 2008	Paragraph 3.141 - Proposal T7 (p.38)	Strategic Park and Ride north of Longbridge Lane-this will be designed in accordance with the following principles; - up to 1000 spaces for park and ride users only - an attractive direct, safe.....	Strategic Park and Ride north of Longbridge Lane-this will be designed in accordance with the following principles; - <del>up to</del> <u>at least</u> 1000 spaces for park and ride users only - an attractive direct, safe.....
Schedule of Minor Changes – October 2008 (Representation no 516/002 and 516/006 CPRE)	Paragraph 3.148 - Proposal T14 (p.39)	Offsite improvements to the Motorway network- including: turning and junction improvements at M5 Junction 4 and where necessary M42 Junctions 1 and 2".	Offsite improvements to the Motorway network-including: turning and junction improvements at M5 Junction 4; and <del>where necessary</del> <u>improvements to traffic signal systems at M42 Junction 1 and 2.</u>
Additional Minor Changes Relating to the Proposals Map and Flood Risk – 2 December 2008	Paragraph 3.172- Proposal OS14 (p.44)	Flooding – no development will be permitted on sites LC1-4, RIS1, H1 and EZ1 until measures are in place to prevent flooding associated with the River Rea. No development will be permitted in site H2 until appropriate measures have been put in place for the River Arrow.	Flooding – no development will be permitted on sites LC1-4, RIS1, H1 and EZ1 until measures are in place to prevent flooding associated with the River Rea. No development will be permitted in site H2 until appropriate measures have been put in place for the River Arrow. <u>Flood risk modelling for both rivers indicates that flooding will be contained within the development proposals contained within the AAP to enhance the river corridors based upon a 1 in 100 flood event (plus climate change) scenario. Matters relating to minimising residual risk associated with 1:1000 year events will be addressed fully at the planning application stage. The Proposals Map shows flood risk zones following implementation of development with measures in place to prevent flooding in the 1:100 flood event scenario.</u>



## PART D: DELIVERY AND IMPLEMENTATION

Table 1: Anticipated s.278 Scheme Requirements

(Source: Schedule of Minor Changes – October 2008)

<b>4 Item</b>	<b>Existing AAP wording</b>	<b>Proposed AAP wording</b>
A38 Road Improvements	Links with River Rea Re-profiling 2009-2011	Links with River Rea Re-profiling <del>2009—2011</del>
Longbridge Lane	2010- 2012	<del>2010—2012</del> Links to development of <u>North and West Works</u>
Groveley Lane	2009- 2010 Links to early phase of East Works redevelopment	<del>2009—2010</del> Links to early phase of East Works redevelopment
Tessell Lane	2009-2011 to tie in with A38	<del>2009—2011</del> Links in with A38
Lickey Road and Lowhill Lane	2010- 2012 links to completion of East Works 1 <sup>st</sup> phase	<del>2010—2012</del> Links to completion of East Works 1 <sup>st</sup> phase
Parsonage Drive Area	2010 –2012 Links to completion of East Works 1st phase	<del>2010—2012</del> Links to completion of East Works 1 <sup>st</sup> phase
M5 Junction 4 and M42 Junction 1 & 2	2013-2014 Links to completion of local centre	<del>2013—2014</del> Links to completion of local centre
A441 Hopwood	2010- 2012 Links to completion of East Works 1st phase	<del>2010—2012</del> Links to completion of East Works 1 <sup>st</sup> phase
Public Transport Interchange/Longbridge Lane	2010- 2012 to tie in with other Longbridge Lane improvements	<del>2010—2012 to tie in with</del> Links with other Longbridge Lane improvements

Table 2: Anticipated Community Infrastructure Improvements

(Source: Schedule of Minor Changes October 2008)

<b>Themes and Components</b>	<b>Phasing Existing AAP wording</b>	<b>Phasing Suggested AAP wording</b>
Longbridge Railway Station	2010 –2012 Link to Longbridge Lane improvements	2010—2012 Link to Longbridge Lane improvements
Rail service and infrastructure improvements – Longbridge/ Bromsgrove and Redditch	Spring 2013 to Spring 2015 to tie in with completion of local centre and early phases of RIS	<del>Spring 2013 to Spring 2015 to tie in with</del> <u>Links</u> with completion of local centre and early phases of RIS
Bus Service Improvements	Introduced for summer 2011. Timetable to include early trial of Buzz Bus network	<del>Introduced for Summer 2011.</del> <u>Links with commencement of local centre and early phases of RIS.</u> Timetable to include early trial of Buzz Bus network.
Education and childcare – Nursery, Creche, Primary and Secondary Schools	New facilities from Spring 2010	<del>New facilities from Spring 2010.</del> <u>Links to delivery of housing. New facilities to be available on completion of first phases of new housing</u>
Public Art	From Spring 2009 to coincide with highway works.	<del>From Spring 2009 to coincide with highway works.</del> Phased throughout development of highway works
Cofton Park- open space, recreational, community and visitor facilities	Spring 2009- 2011 to partly coincide with opening of first release of east works housing.	<del>Spring 2009—2011 to partly coincide with opening of first release of east works housing.</del> <u>Links to delivery of housing. Works to coincide with completion of early phases of H1 and H2.</u>
Other off site open space enhancements, recreational improvements, walking / cycling routes and ecological mitigation	Links to delivery of housing. Works to coincide with completion of early phases of H1 and H2.	<del>Links to delivery of housing. Works to coincide with completion of early phases of H1 and H2.</del> <u>Open space, recreational and ecological improvements link to delivery of housing. Works to coincide with completion of early phases of H1 and H2</u> <u>Walking cycling improvements link to delivery of local centre and throughout the scheme.</u>
Local Employment	Autumn 2008 Linked to approval of	<del>Autumn 2008</del> Linked to approval of first planning applications

<b>Themes and Components</b>	<b>Phasing Existing AAP wording</b>	<b>Phasing Suggested AAP wording</b>
and Training Agreements	first planning applications for construction works.	for construction works.
Enterprise and Business Support	Spring 2010. Linked to start of works on mixed use and employment quarters.	<del>Spring 2010.</del> Linked to start of works on mixed use and employment quarters.
Safer Communities	To start 2010. Programme Timetable linked to early residential developments.	<del>To start 2010.</del> Programme Timetable linked to early residential developments.
Healthy living and sports development	To start with Spring 2010. Programme timetable linked to outreach work ahead of new centre opening.	<del>To start with Spring 2010.</del> Programme timetable linked to outreach work ahead of new centre opening.
Lifelong Learning	To start with Spring 2010. Programme timetable linked to opening of new library at east works	<del>To start with Spring 2010.</del> Programme timetable linked to opening of new Cofton library at east works.
Community Cohesion and Inclusion	To start with Spring 2009 programme	<del>To start with Spring 2009 programme.</del> <u>Throughout development, starting on completion of early phases of development.</u>
Heritage and Culture	To start with Spring 2009 programme. Strong links with development of new library at east works and the Austin building.	<del>To start with Spring 2009 programme.</del> Strong Links with development of new library and The Austin building.
Sustainable transport and off-site mitigation	Coordinator to be introduced by 2010. Other improvements as scheme progresses.	<del>Coordinator to be introduced by 2010. Other improvements as scheme progresses.</del> <u>Linked to requirements of Site Wide Travel Plan and more detailed travel plans for specific users.</u>
S.106 and Community Infrastructure Levy Administration	Autumn 2008 onwards linked to first approved planning permissions	<del>Autumn 2008</del> <u>January 2009</u> onwards linked to first approved planning permissions.

Paragraph 4.17 – Development Phasing (Source: Schedule of Minor Changes October 2008)

<b>Paragraph 4.17 existing AAP wording</b>	<b>Paragraph 4.17 suggested AAP wording</b>
<p><i>Site Remediation</i></p> <p>North and West Works Site; Spring 2008 – Summer 2009</p> <p>East Works; Spring 2008 – Summer 2009</p>	<p><i>Site Remediation</i></p> <p>North and West Works Site; Spring 2008 – <del>Summer</del><u>Autumn</u> 2009</p> <p>East Works; <del>Spring 2008 – Summer 2009</del> <u>Autumn 2009 – Autumn 2010</u></p>
<p><b>Highways works, Transport Infrastructure and River Networks;</b></p> <p>A38 Road Improvements and River Rea Profiling 2009 – 2011</p> <p>River Arrow Profiling Spring 2009 – Spring 2010</p> <p>other improvements see above tables</p>	<p><b>Highways works, Transport Infrastructure and River Networks;</b></p> <p>A38 Road improvements and River Rea Profiling 2009 – 2011</p> <p>River Arrow Profiling Spring <del>2009-2010</del> – Spring <del>2010</del> <u>2011</u></p> <p>other improvements see above tables</p>
<p>Development Construction and Key Physical Community Infrastructure</p> <p>North Works Learning Quarter Spring 2009 – Summer 2011</p> <p>North Works Retail Quarter – Spring 2009 – Autumn 2011</p> <p>North Works The Austin Building– Summer 2010 – Summer 2011</p> <p>North Works Mixed use Quarter – Summer 2010 - Summer 2015</p> <p>North Works Employment Quarter– Spring 2010 – Summer 2016</p>	<p>Development Construction and Key Physical Community Infrastructure</p> <p>North Works Learning Quarter <del>Spring</del> <u>Autumn</u> 2009 – <del>Summer</del> <u>Autumn</u> 2011</p> <p>North Works Retail Quarter – <del>Spring</del> <u>Autumn</u> 2009 – <del>Autumn</del> <u>Summer 2011 2012</u></p> <p>North Works The Austin Building – Summer <del>2010</del> <u>2011</u> – Summer <del>2011</del><u>2012</u></p> <p>North Works Mixed use Quarter – Summer <del>2010</del> <u>2011</u> - Summer <del>2015</del> <u>2016</u></p> <p>North Works Employment Zone– <del>Spring</del> <u>Summer 2010 2011</u> – Summer <del>2016</del><u>2017</u></p>

<b>Paragraph 4.17 existing AAP wording</b>	<b>Paragraph 4.17 suggested AAP wording</b>
East Works residential phase 1 – Spring 2009 – Spring 2012	East Works residential phase 1 – <del>Spring 2009</del> <u>Autumn 2010</u> – <del>Spring 2012</del> <u>Summer 2011</u>
East Works Library /Community Building: Spring 2009 – Spring 2010	East Works Library /Community Building: <del>Spring 2009</del> <u>Autumn 2010</u> – <del>Spring 2010</del> <u>Autumn 2011</u>
East Works residential phase 2 – Spring 2012- Spring 2015	East Works residential phase 2 – <del>Spring 2012</del> <u>Summer 2011</u> – <del>Spring 2015</del> <u>Summer 2012</u>
West Works Housing – Spring 2010 – Spring 2014	West Works Housing – Spring <del>2010</del> <u>2011</u> – Spring <del>2014</del> <u>2015</u>
West Works RIS Phase 1 – Spring 2010 – Spring 2012	West Works RIS Phase 1 – Spring <del>2010</del> <u>2011</u> – Spring <del>2012</del> <u>2013</u>
West Works RIS Phase 2 – Spring 2012 – Spring 2017	West Works RIS Phase 2 – Spring <del>2012</del> <u>2013</u> – Spring <del>2017</del> <u>2018</u>
West Works RIS Phase 3 – Spring 2018+	West Works RIS Phase 3 – Spring <del>2018+</del> <u>2019+</u>
Cofton Park Improvements – 2009- 2011	Cofton Park Improvements – <del>2009–2011</del> <u>2011 – 2013</u>
Other Open Space and recreational – Spring 2009- Spring 2012	Other Open Space and recreational – <del>Spring 2009–Spring 2012</del> <u>2011 – 2014</u>
	<u>Delivery will however be dependent on market conditions at the time of the Development.</u>

Table 4 Longbridge Housing Trajectory (Source: Schedule of Minor Changes October 2008)

	<b>2009/ 2010</b>	<b>2010/ 2011</b>	<b>2011/ 2012</b>	<b>2012/ 2013</b>	<b>2013/ 2014</b>	<b>2014/ 2015</b>	<b>2015/ 2016</b>	<b>2016/ 2017</b>	<b>Total</b>
<b>Projected Completions Total</b>	0	100	240	240	240	240	240	150	1450
<b>Market Housing</b>	0	65	156	156	156	156	156	97	942
<b>Affordable Housing</b>	0	35	84	84	84	84	84	53	508

<b>Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (New text is underlined)
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Paragraph 4.2 (p.45)	<p>The implementation of the Longbridge AAP will be very dependent upon:</p> <ul style="list-style-type: none"> <li>Commercial interest in the types and mix of land uses proposed.</li> <li>The levels of on site constraints and development costs.</li> <li>Financial returns on remediated land and packaged sites.</li> <li>The viability of schemes at the time planning applications are submitted</li> </ul>	<p>The implementation of the Longbridge AAP <u>over the life of the plan</u> will be very dependent upon:</p> <ul style="list-style-type: none"> <li>Commercial interest in the types and mix of land uses proposed.</li> <li>The levels of on site constraints and development costs.</li> <li>Financial returns on remediated land and packaged sites.</li> <li>The viability of schemes at the time planning applications are submitted.</li> <li><u>Implementation of public sector initiatives and availability of public sector and other stakeholder funding, including co-funding or gap funding, as necessary.</u></li> </ul>

<b>Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (New text is underlined)
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Paragraph 4.3 (p.45)	<p>A detailed viability model has been established for the Longbridge AAP, which underpins and supports the proposals established in this document. An 'open book' approach has been taken with the main developer to broadly agree the variables within the model. The model has enabled the local authorities to:</p> <ul style="list-style-type: none"> <li>• Establish the principal costs associated with the development and better understand end scheme values and site phasing.</li> <li>• Take into consideration the development costs of the sustainability standards detailed in the Sustainability Strategy.</li> <li>• Build in major major infrastructure requirements and mitigation measures.</li> <li>• Balance overall costs against return and identify break even.</li> <li>• Look at options for improving cash flow within the lifespan of the scheme.</li> </ul>	<p>A detailed viability model has been established for the Longbridge AAP, which underpins and supports the proposals established in this document. An 'open book' approach has been taken with the main developer to broadly agree the variables within the model. The model has enabled the local authorities to:</p> <ul style="list-style-type: none"> <li>• Establish the principal costs associated with the development and better understand <del>end</del> <u>potential</u> scheme values and site phasing.</li> <li>• Take into consideration the development costs of the sustainability standards detailed in the Sustainability Strategy.</li> <li>• Build in major infrastructure requirements and mitigation measures.</li> <li>• Balance overall costs against return <del>and identify break even.</del></li> <li>• Look at options for improving cash flow within the lifespan of the scheme <u>including public funding.</u></li> </ul>

<b>Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (New text is underlined)
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	4.4a (p.45) New paragraphs.		<p><u>The development will require an element of public funding and further information on this is set out in table 5 and in Appendix 5.</u></p> <p><u>In addition, the previously developed nature of the site, which requires substantial remediation and other abnormal costs, means that viability is likely to be an issue in times of difficult market conditions. In such circumstances a flexible approach to any negotiations at planning application stage will be required to ensure viability and that the delivery of an acceptable scheme on the ground is not constrained or delayed. The approach to such negotiations is set out in paragraph 4.22a below.</u></p>
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Paragraph 4.5 to be amended (p.45)	<p>The redevelopment of Longbridge will result in 10,000 jobs, a minimum of 1,450 new dwellings and approximately 3,500 new residents. This creates a need for a range of essential physical and community infrastructure and other measures, without which:</p> <ul style="list-style-type: none"> <li>• There will be a detrimental effect on local amenity and the quality of the environment.</li> <li>• New developments will not be able to operate efficiently.</li> <li>• Opportunities to make a positive contribution towards meeting the day-to-day needs of the population may be lost.</li> </ul>	<p>The redevelopment of Longbridge will result in 10,000 jobs, a minimum of 1,450 new dwellings and approximately 3,500 new residents. This creates a need for a range of essential physical and community infrastructure and other measures, without which:</p> <ul style="list-style-type: none"> <li>• There <del>will</del> <u>may</u> be a detrimental effect on local amenity and the quality of the environment.</li> <li>• New developments will not be able to operate efficiently.</li> <li>• Opportunities to make a positive contribution towards meeting the day-to-day needs of the population may be lost.</li> </ul>



<b>Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (New text is underlined)
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Paragraph 4.6 to be amended (p.45)	In terms of planning obligations, these may require the developer to carry out certain prescribed works to provide the appropriate infrastructure and measures (e.g. requiring that a certain proportion of housing is affordable); compensate for loss or damage created by the development (e.g. loss of open space) and/or mitigate the negative impacts of a development and to ensure that it makes a positive contribution to the communities within which it is situated (e.g. through increased public transport provision). These types of obligations, which are in line with Planning Obligations Circular 05/05 are identified in the site-specific proposals in Section C of the Plan and Tables 1 and 2 below.	In terms of planning obligations, these may require the developer to carry out certain prescribed works to provide the appropriate infrastructure and measures (e.g. requiring that a certain proportion of housing is affordable); <del>compensate for loss or damage created by the development (e.g. loss of open space)</del> and/or mitigate the negative impacts of a development and to ensure that it makes a positive contribution to the communities within which it is situated (e.g. through <u>environmental mitigation measures and increased public transport provision</u> ). These types of obligations, which are in line with Planning Obligations Circular 05/05 are identified in the site-specific proposals in Section C of the Plan and Tables 1 and 2 below.
Schedule of Minor Changes October 2008 - Representation no 14/016 St Modwen	Paragraph 4.6 to be amended by adding new sentence at end (p.45)		<u>Where appropriate, planning conditions will also be used to secure infrastructure and other measures.</u>

<b>Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (New text is underlined)
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Paragraph 4.7 to be amended (p.45)	<p>The local authorities involved in producing the Longbridge AAP have agreed a planning contributions model, which consists of both traditionally negotiated S106 elements, such as affordable housing, and a simple Longbridge Community Infrastructure Levy (CIL) to support the development of the area. This approach has several advantages including:</p> <ul style="list-style-type: none"> <li>• Providing clarity and certainty for developers over the scale of planning contribution requirements.</li> <li>• Providing certainty for existing local residents and businesses that new development will make a fair contribution towards minimising the detrimental impact of schemes on local amenity and the quality of the environment.</li> <li>• Providing the opportunity for strategic and joined-up thinking that connects spatial planning with site phasing, delivery plans and business planning.</li> <li>• Providing a range of essential infrastructure at the right time in the implementation of the development.</li> </ul>	<p>The local authorities involved in producing the Longbridge AAP have agreed a planning contributions model, which consists of both traditionally negotiated S106 elements, such as affordable housing, and a simple Longbridge <u>Community Infrastructure Levy (CIL)-Tariff (LIT)</u> to support the development of the area. This approach <u>could have</u> <del>has</del> several advantages including:</p> <ul style="list-style-type: none"> <li>• Providing clarity and certainty for developers over the scale of planning contribution requirements.</li> <li>• Providing certainty for existing local residents and businesses that new development will make a fair contribution towards minimising the detrimental impact of schemes on local amenity and the quality of the environment.</li> <li>• Providing the opportunity for strategic and joined-up thinking that connects spatial planning with site phasing, delivery plans and business planning.</li> <li>• Providing a range of essential infrastructure at the right time in the implementation of the development</li> </ul>

<b>Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (New text is underlined)
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Paragraph 4.8 amendments (p.45)	The planning contributions model also sits alongside a package of Section 278 and S38 agreements for the private sector funding of works on local and strategic roads as required by the proposals in the Movement Strategy. The S278 Agreements provide a well tested financial mechanism for ensuring delivery of mitigation works identified and determined as necessary for planning permission to be granted. Table 1 provides information on the key S278 requirements as part of the Longbridge AAP.	The planning contributions model also sits alongside a package of Section 278 and S38 agreements for the private sector <u>and other stakeholder</u> funding of works on local and strategic roads as required by the proposals in the Movement Strategy. The S278 Agreements provide a well tested financial mechanism for ensuring delivery of mitigation works identified and determined as necessary for planning permission to be granted. Table 1 provides information on the key <u>anticipated</u> S278 requirements as part of the Longbridge AAP.
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Table 1 Title (p.46)	S278 scheme requirements	<u>Anticipated</u> S278 scheme requirements
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Paragraph 4.10 amendments (p.47)	The planning contributions associated with the Longbridge AAP are split into traditionally negotiated agreements and a supporting Longbridge Community Infrastructure Levy (CIL), which covers both residential and non-residential elements of the development.	The planning contributions associated with the Longbridge AAP are split into traditionally negotiated agreements <u>under Section 106</u> , and a supporting Longbridge <del>Community</del> Infrastructure Levy (CIL) <u>Tariff (LIT)</u> , which covers both residential and non-residential elements of the development. <u>If the scheme is not viable at the time of submitting planning applications there will be a need for negotiations on the application, including the S106 and LIT elements, and taking account of the availability of public sector and other stakeholder funding. The approach to this is set out in para 4.22a below.</u>

<b>Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (New text is underlined)
Affordable Housing Minor Changes Paper – 14 October 2008	Paragraph 4.11, 1 <sup>st</sup> bullet point (p.47)	Establishing 35% affordable housing across the site.	5 <u>Establishing</u> A target of 35% affordable housing across the site.
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Paragraph 4.12 (p.47)	<b>Longbridge Community Infrastructure Levy</b> With regard to the CIL, community infrastructure has been defined by the joint charging authorities (Bromsgrove District Council and Birmingham City Council) as 'infrastructure of local and strategic importance to the delivery of sustainable developments'. Table 2 summarises a broad schedule of community infrastructure requirements, required to support the Longbridge AAP. Further information on the community infrastructure requirements including outline costs, information sources and methods of calculation are included in the Longbridge Viability and Deliverability Technical Baseline report.	<b>Longbridge Community Infrastructure Levy Improvements</b> With regard to the <del>CIL</del> <u>LIT</u> , community infrastructure has been defined by the joint charging authorities (Bromsgrove District Council and Birmingham City Council) as 'infrastructure of local and strategic importance to the delivery of sustainable developments'. Table 2 summarises a broad schedule of <u>anticipated</u> community infrastructure <del>requirements, required to</del> <u>improvements</u> to support the Longbridge AAP. Further information on the community infrastructure requirements including outline costs, information sources and methods of calculation are included in the Longbridge Viability and Deliverability Technical Baseline report.
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Table 2 Title (p.48)	Longbridge Community Infrastructure Requirements	<u>Anticipated</u> Longbridge Community Infrastructure <del>Requirements-Improvements</del>

<b>Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (New text is underlined)
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Paragraph 4.13 amendments (p.51)	A significant number of the Community Infrastructure requirements will need to be delivered upfront and at certain phased intervals in the overall development schedule. This means that the planning contributions model will require a degree of forward funding to support regeneration and development. The role of banker is essential to fund infrastructure and bridge the cash flow gap between scheme expenditure and income. Income from the development will be obtained through the application of a levy on residential and non-residential development.	<p><del>Some A significant number of the Community Infrastructure improvements requirements will</del> <u>may</u> need to be delivered upfront and at certain phased intervals in the overall development schedule. This means that the planning contributions model will require a degree of forward funding to support regeneration and development. <u>The role of the Accountable Body and its banking role will therefore be essential in this respect. The banker and other stakeholders will be expected to demonstrate that all reasonable endeavours have been undertaken to minimize unnecessary expenditure and to identify funding where there is a gap between scheme expenditure and income.</u></p> <p><u>Footnotes</u>  <u>1. The banking function will be administered in accordance with local authority accounting regulations and principles,</u>  <u>2. The banker may provide deficit funding to the LIT Fund to enable essential development works to take place in advance of receipts, subject to certain financial limits. All costs incurred under the banking function will be charged against the LIT Fund.</u></p>
Fact Check Report – Minor Change	Table 3 2 <sup>nd</sup> tariff element	A1 Supermarket	<u>A1 Supermarket Superstore</u>

<b>Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (New text is underlined)
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Paragraph 4.15 amendments (p.51)	<p>Residential</p> <ul style="list-style-type: none"> <li>• 10% upon implementable planning consent</li> <li>• 15% on commencement on site</li> <li>• 75% on a quarterly basis after the first completion is sold</li> </ul> <p>Non-residential</p> <ul style="list-style-type: none"> <li>• 25% on commencement on site</li> <li>• 25% before completion of each unit</li> <li>• 50% prior to the occupation of each unit.</li> </ul>	<p><del>Residential</del></p> <ul style="list-style-type: none"> <li><del>• 10% upon implementable planning consent</del></li> <li><del>• 15% on commencement on site</del></li> <li><del>• 75% on a quarterly basis after the first completion is sold</del></li> </ul> <p><del>Non-residential</del></p> <ul style="list-style-type: none"> <li><del>• 25% on commencement on site</del></li> <li><del>• 25% before completion of each unit</del></li> <li><del>• 50% prior to the occupation of each unit</del></li> </ul> <p><b>Residential and Non-Residential</b></p> <ul style="list-style-type: none"> <li>• <u>25% on commencement on site</u></li> <li>• <u>25% before completion of each unit</u></li> <li>• <u>50% prior to the occupation of each unit</u></li> </ul>

<b>Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (New text is underlined)
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Add new paragraph 4.16a (p.52)		<p><u>There is a diverse range of infrastructure improvements to deliver the requirements of the LAAP, ranging from key strategic transport infrastructure to those that deliver community and social benefits.</u></p> <p><u>The expenditure of infrastructure monies will need to be spent against a detailed delivery plan, which sets out:</u></p> <ul style="list-style-type: none"> <li>• <u>The various roles and responsibilities of organizations and stakeholders;</u></li> <li>• <u>A construction schedule linked to tariff triggers and prioritised expenditure items;</u></li> <li>• <u>A detailed delivery programme</u></li> <li>• <u>A business case, appraisal and sign-off process for tariff expenditure components;</u></li> <li>• <u>Agreed project milestones, outputs and outcomes;</u></li> <li>• <u>Delivery agreements with lead organizations, and</u></li> <li>• <u>A monitoring framework linked to LAAP monitoring and review requirements.</u></li> </ul> <p><u>The delivery plan will also be reviewed regularly in light of planning application submissions, viability assessments and changing infrastructure costs, tariff income and expenditure profiles.</u></p>

Information Source	AAP proposal / paragraph	Existing AAP text	Proposed change(s) (New text is underlined)
	Para 4.22a	New paragraph	<p><u>It is recognized that market conditions are subject to change, and that these can impact on the viability of development. If at the time planning applications are submitted, it can be shown through an open development appraisal, that a scheme may be unviable if the LAAP's policies have to be applied in full; then the Local Authorities will enter into detailed negotiations with the applicants to determine what may be acceptable to enable the scheme to proceed.</u></p> <ul style="list-style-type: none"> <li>•</li> <li>• <u>In such cases, the planning obligations that have not delivered the full tariff levels set out in table 3 will include mechanisms to allow the scale of obligations to be increased if it can be demonstrated that market conditions improve at the time the development is implemented. e.g. through linking the tariff payments to phases of the development.</u></li> </ul>



Table 5: Summary Implementation Plan (p.54-56) (Source: Note on Funding - 27<sup>th</sup> November 2008)

<b>AAP Policy / Paragraph</b>	<b>Existing AAP Text</b>	<b>Proposed Changes (underlined)</b>	<b>Existing AAP Text</b>	<b>Proposed Changes (underlined)</b>
<b>AAP Proposals and Policy</b>	<b>Delivery Funding</b>	<b>Delivery Funding</b>	<b>Phasing and Timetabling</b>	<b>Phasing and Timetabling</b>
Proposals S1 – Sustainability Building Standards	Private Sector	Private Sector <u>and Homes and Communities Agency (HCA)</u>		
Proposal S2 – Site Wide Sustainability Criteria	Private Sector	Private Sector <u>and Lottery Funding RFA</u>		
Proposal LC1 and LC2 Learning Quarter			Start on site 2008 following completion of remediation works. Completion 2010.	Start on site <del>2008</del> <u>2009</u> following completion of remediation works. Completion <del>2010</del> <u>2011</u> .
Proposal LC1 and LC3 Retail Quarter			Start on site 2008 following completion of remediation works. Completion 2011 onwards.	Start on site <del>2008</del> <u>2009</u> following completion of remediation works. Completion from <del>2011</del> <u>2012</u> onwards.
Proposal LC1 and LC4 – Mixed use quarter inc hsing, heritage building, offices	Private Sector RSL	Private Sector RSL <u>Lottery Funding</u>	Start on site 2008 following completion of remediation works.	Start on site <u>2011</u> . <del>site 2008</del> following completion of remediation works.
Proposal EZ1	Private Sector	Private Sector <u>RFA HCA</u>	Start on site 2008 following completion of remediation works.	Start on site <u>2011</u> . <del>2008</del> following completion of remediation works.
Proposal RIS1	Private Sector AWM CTB	Private Sector <u>RFA HCA</u>	First phase start on site 2010.	First phase start on site <del>2010</del> <u>2011</u> .
Proposal H1 – Housing on West Works			Start on site 2010.	Start on site <del>2010</del> <u>2011</u> .
Proposal H2 – East Works Housing			Start on site 2009.	Start on site <del>2009</del> <u>2010</u> .
Transport and Movement Strategy (OS1-17)	Private Sector Local Authorities Funding Programmes	Private Sector Local Authorities <u>Stakeholders Funding Programmes</u>	Start on site 2008.	Start on site <del>2008</del> <u>2009</u> .
Environment Open Space and Landscape Strategy (OS1-17)	Private Sector Local Authorities Funding Programmes	Private Sector Local Authorities <u>Stakeholders Funding Programmes</u>	Start 2008 following completion of remediation works.	Start <del>2008</del> <u>2009</u> following completion of remediation works.

Table 6: Longbridge AAP Monitoring Requirements (p.57-62) (Source: Schedule of Minor Changes – October 2008 / Additional Supporting Material Advantage West Midlands 24/005)

New Table Entry

<b>AAP Themes and Objectives</b>	<b>AAP Proposals and Policy</b>	<b>Key Performance Indicators (KPI)</b>	<b>Indicator Cross Reference</b>	<b>Information Source</b>	<b>Responsibility</b>
Obj. 2 – <u>Sustainable Buildings and Infrastructure</u>	<u>S2</u>	<u>KPI 9: Reduction in carbon dioxide (CO2) emissions produced in the AAP area</u>	<u>BCC Sustainable Community Strategy</u>	<u>Utilisation of assessment tool</u>	<u>BCC / BDC</u>
		<u>KPI10: Climate change adaptation measures in the AAP area</u>	<u>BCC Sustainable Community Strategy</u>	<u>Collection of information on projects</u>	<u>BCC / BDC</u>
		<u>KPI 11: Increase in the percentage of household waste sent for recycling</u>	<u>Links to Draft BCC Municipal Waste Management Strategy (BVPI 82a)</u>	<u>Waste collection data</u>	<u>BCC / BDC</u>
		<u>KPI 12: Reduction in the weight (in kilograms) of household waste collected per head of the population</u>	<u>Links to Draft BCC Municipal Waste Management Strategy (BVPI 84)</u>	<u>Waste collection data</u>	<u>BCC / BDC</u>

## APPENDICES

### EXISTING APPENDICES

#### APPENDIX 4 Glossary of Terms (p.66-72)

<b>Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (Changes are underlined)
Schedule of Minor Changes October 2008 - Representation no 12/002 RPS o.b.o ASDA stores	Appendix 4 Glossary of terms to be amended by adding definition of active frontage		<u>Active Frontages</u>  <u>Active frontages are frontages with main doors and windows- including glazed store frontages- at street level adjoining the public realm and highways to allow activity natural surveillance and overlooking.</u>
Schedule of Minor Changes October 2008- Representation no 12/006 RPS o.b.o ASDA stores	Appendix 4 Glossary of terms to be amended by adding definition of superstore		<u>Superstores</u>  <u>Superstores are self-service stores selling mainly food, or food and non-food goods with more than 2,500sq.m. trading floorspace.</u>

NEW APPENDIXAPPENDIX 5: OTHER SOURCES OF FUNDING (source: Note on Funding – 27<sup>th</sup> November 2008)

To ensure that all financial opportunities are explored to support the sustainable development of Longbridge, the local authorities are pursuing in conjunction with other key stakeholders, other sources of funding than developer contributions. These monies could be used to bridge any scheme viability gap and part fund community infrastructure projects which may not otherwise be fully delivered following a review of the viability of planning applications and / or b) add additional value to the delivery of community infrastructure projects.

- A project proposal has been submitted under the Regional Funding Advice (RFA) for £50m, which aims to deliver an integrated approach that covers housing and regeneration, economic development and transport activities.
- Discussions are ongoing with English Partnerships element of the new Homes and Communities Agency regarding potentially part funding remediation, site infrastructure and servicing costs to assist in bridging the current scheme viability gap.
- The Housing Corporation (HC) element of the Homes and Communities Agency has also indicated an interest in potentially funding the difference in construction costs between Code for Sustainable Homes Level 3 and Level 4 on affordable housing. HC funding may be available for meeting affordable housing targets beyond 35% depending on circumstances.
- Monies may be available through existing transportation programmes of work to support transport improvements in the Longbridge area. This could include contributions towards traffic management, junction and pedestrian signal upgrades, cycling improvements and public transport infrastructure.
- There is a wide range of potential funding options (including Lottery and Central Government) which may be available to part fund or add value to community infrastructure provision. These types of funding options should be fully explored in the development of the delivery plan for Longbridge.
- The existence of the AAP is likely to have a positive impact in providing a strategic focus for funding and attracting other types of investment including public sector contributions towards new buildings and major capital schemes, such as Bournville College.

## PROPOSALS MAP

- 1 Flood Risk Amendment: Show the area subject to a 1:100 year flood risk alongside the River Rea, to which Proposal OS14 relates
- 2 Delete Lickey Road from the "Primary Movement Route".

## APPENDIX 2

The following minor changes have been put forward by the Councils, and should be made in the interests of clarification.

<b>LPAs' Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (Changes are underlined)
Schedule of Minor Changes to the AAP – October 2008 (Representation No. 516 / 008 CPRE)	Paragraph 3.52 Proposal LC3 Additional pullet point to be added (p.25)		<u>6 Services for visiting members of the public (e.g. dentists, launderettes, betting offices) where these do not impinge on the viability of the centre.</u>
Schedule of Minor Changes October 2008 - Representation no 22/001- Sport England	Paragraph 3.48 3rd sentence to be amended (p.24).	It will include facilities accessible to the general/public including a library and recreational/sports facilities/resources	It will include facilities accessible to the general/public including a library and recreational/sports facilities/resources, <u>which will be achieved through appropriate legal agreements.</u>
Schedule of Minor Changes October 2008 - Minor amendments and corrections. Also CPRE Representation 516/014	Paragraph 3.106 second bullet (p.32)	Health centre, day nursery, place of worship (Class D2) to be located at the northern end of the site.	Health centre, day nursery, place of worship (Class <u>D2 D1</u> ) to be located at the northern end of the site.
Additional Minor Changes to the AAP relating to Transportation – November 2008	Paragraph 3.142 - Proposal T8 (p.39)	Highway improvements in the Area Action Plan area- comprising highway and/or junction improvements on the A38 Bristol Road south, Lickey Road, Lowhill Lane, Longbridge Lane, and Groveley Lane. These measures will include signal controlled junctions, bus priority measures, access points, bridge work, landscaping, tree planting, pedestrian, bus and cycle facilities as appropriate.	Highway improvements in the Area Action Plan area- comprising highway and/or junction improvements on the A38 Bristol Road south, Lickey Road, Lowhill Lane, Longbridge Lane, and Groveley Lane. These measures will include signal controlled junctions, bus priority measures, access points, bridge work, landscaping, tree planting, pedestrian, bus and cycle facilities as appropriate. <u>All improvements will be designed to be attractive to pedestrians and cyclists.</u>

<b>LPAs' Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (Changes are underlined)
Additional Minor Changes to the AAP relating to Transportation – November 2008	Paragraph 3.143 - Proposal T9 (p.39)	Car parking- A multi storey car park is proposed to serve the local centre. The car park to be well designed with attractive elevations wherever possible and measures to minimise impact on nearby residents. The majority of the parking spaces for the Regional Investment Site are to be located in multi-storey car parks. Across the AAP area there will be no site extensive surface car parking and parking should not normally be visible from the public realm. Car parking standards are set out in Appendix 3. Birmingham City Council's Car Park Design Guide will apply. Car park management plans to be prepared to promote shared use of car parking to include appropriate charges to encourage modal shift.	Car parking- A multi storey car park is proposed to serve the local centre. The car park to be well designed with attractive elevations wherever possible and measures to minimise impact on nearby residents. The majority of the parking spaces for the Regional Investment Site are to be located in multi-storey car parks. Across the AAP area there will be no site extensive surface car parking and parking should not normally be visible from the public realm. Car parking standards are set out in Appendix 3. Birmingham City Council's Car Park Design Guide will apply. <u>Planning conditions will require</u> car park management plans to be prepared to promote shared use of car parking to include appropriate charges to encourage modal shift.
Schedule of Minor Changes - October 2008 Representations- No 516/005 CPRE No 552/001 Nanjing Automobile Corporation, No 335/001 Roger King (Road Haulage Associaton)	Paragraph 3.144- Proposal T10 (p.39)	Access points –the main road access points into the new development are shown on the Movement Strategy Plan and will be constructed to an appropriate standard. An adoption regime will be agreed.	7 <u>Access points – the main road access points into the new development are shown on the Movement Strategy Plan and will be constructed to an appropriate standard. Further 'minor road access' points will also be required.</u> An adoption regime will be agreed.
Schedule of Minor Changes – October 2008 (Representation no 516/002 and 516/006 CPRE)	Paragraph 3.149 - Proposal T15 (p.39)	Traffic management measures, residents' parking zones, outside the AAP areas needed as a result of the development	8 <u>Traffic management measures, residents' parking zones, and other measures such as signage outside the AAP areas needed as a result of the development."</u>

<b>LPAs' Information Source</b>	<b>AAP proposal / paragraph</b>	<b>Existing AAP text</b>	<b>Proposed change(s)</b> (Changes are underlined)
Schedule of Minor Changes October 2008 - Minor amendments and corrections	Open space map (p.40) Title		Open Space Map The plan title should be <u>Environment, Open Space and Landscape Strategy Plan</u>
Additional Minor Changes to the AAP Relating to Delivery and Implementation – 26 November 2008	Paragraph 4.11 Heading (p.47)	Negotiated Elements	Negotiated <del>Elements</del> <u>Section 106 Agreements</u>
Affordable Housing Minor Changes Paper – 14 October 2008	Paragraph 4.11 (p.47)	The key negotiated elements of the scheme to include:	9 The <del>key negotiated elements of the scheme</del> <u>elements of the scheme for negotiations to include:</u>
Affordable Housing Minor Changes Paper – 14 October 2008	Glossary of terms Definition Affordable Housing <sup>1<sup>st</sup></sup> line (p.66)	There is a range of affordable housing including	10 <del>There is a range of affordable housing including</del> <u>Affordable housing to include the following:</u>