

CityPark4Brum – Planning Application 2022/09643/PA

My reference: **7801732**

Introduction and Background

In contrast to its leafy suburbs, Birmingham suffers from a severe lack of green space at its centre. And with the city centre population almost trebling in size since the turn of the century, the green space deficit for city residents and visitors alike is getting progressively worse. However, when the Wholesale Markets site at Smithfield, the size of over 20 football pitches, was vacated back in 2015, suddenly there was an opportunity to address this issue once and for all. The resulting CityPark4Brum campaign for a large park at Smithfield caught the imagination of the public, with thousands of people (current count is over 11,400 signatures) recognising a once-in-a-generation opportunity to create a large green oasis on public land in the heart of our city. However despite a park being included in the 2016 council masterplan as a result of our campaign, eight years later it is clear that the green space plan revealed in this planning application is not what supporters campaigned for. In particular the park itself is smaller than Cathedral Square, it occupies less than 5% of the site and is poorly connected to other open space areas, being enclosed on all four sides.

Objection Points

The area that includes the proposed park is not part of the first phase of the application (Detailed Area). This is disappointing as we do not believe that the best design for a new park and associated open space in the heart of Birmingham can be achieved without a detailed landscaping plan for the whole of the Smithfield site being put forward in its entirety now. This is particularly important given the lack of green space in the later phases relative to the large housing requirements, for which outline planning permission has also been requested (Outline Area).

CityPark4Brum is basing its objection to this Hybrid Planning Application based around two specific points, as outlined below:

1. Open and Green Space Provision and Design

It is encouraging to see the significant improvements to the 2022 application that have been made to Festival Square, now renamed Manor Square, which is the main public focal point of the scheme. In addition to the reshaping of the public realm to more faithfully reference the site's heritage, the provision of a grassed area large enough for some recreational activity is welcomed, as are the detailed designs for the natural play features incorporated around the perimeter of this space, and complementary soft landscaping. This change will significantly improve opportunities for play and recreation by the public. Grassed areas and natural play features, when managed appropriately, are implicitly more inclusive to inviting use by the public, as opposed to hard, civic landscapes. Nevertheless, despite these changes, the proposed open and green space throughout the whole site is poorly connected and the proposed park itself is too enclosed and too small. These issues are expanded upon below in Points 1.1 and 1.2.

1.1 Open and Green Space Connectivity

There is very poor connectivity between the two main areas of open space, Manor Square and Smithfield Park. The main problem is with Sub-Zone 3.2, where Plot 3B and Plot 3C

are located, with the buildings here as well as residential plot 1A (Zone 2.0) creating an unnecessary physical barrier between these two areas. Adopting this building configuration would result in a lost opportunity to create a larger area of transformative open and green space at the heart of Smithfield. The current design also creates a potential bottleneck leading away from Market Square towards the park, which could be dangerous and unsafe for people when 'at capacity' events are held there.

1.2 Smithfield Park

The park is not on the sightline from St Martin's church, reinforcing its disconnection from the city centre, both visually, physically and psychologically. It will feel like a semi-private space, if it is even discovered at all by visitors to the city centre. It is essentially enclosed and boxed in on all four sides, with Plot 2B creating an additional and unnecessary physical barrier to access from Bishop Street and surrounding streets to the south of the site. Finally at 0.65 hectares, its size is simply too small, occupying less than 5% of the site. Therefore both its location and size does not make Smithfield Park the transformative area of green space currently missing in the city centre that would benefit both residents and visitors alike.

2. Non-compliance with BCC Policies

Before we set out below in Points 2.1 and 2.2 where we believe the application specifically contravenes or ignores adopted council policies, as per our earlier comments, we would first like to state how we welcome the addition of children's natural play provision within the design of Manor Square. However given that provision of children's play facilities is also a BCC policy requirement 'where there is no existing facility within easy walking distance' (which there isn't), we would request that this is specifically protected in any Conditions or Reserved Matters relating to any consent made on this or future versions of the application.

2.1 BCC Requirement of 2 Hectares of New Public Open Space per 1000 Residents

2.11 *The whole site (Detailed Area and Outline Area combined)*: BCC's requirement of 2 hectares of new public open space for every 1000 residents in new developments, as stipulated in the BDP Policy TP9 and in the supplementary planning document "*Public Open Space in New Residential Development SPD 2007*" (and as also mentioned in this application, e.g. Document 1, Planning Statement, sections 6.8 and 7.77), has not been enacted (for the SPD, see:

https://www.birmingham.gov.uk/downloads/download/212/public_open_space_in_new_residential_development_supplementary_planning_document).

Under the current application, over 4000 homes are being proposed (429 in the Detailed Area and a further 3650 indicated in the Outline Area, as also detailed in the Planning Statement). Even if each dwelling were a one bedroom flat, this would still equate to over 8ha of open space being required on a site that totals 17.3ha in total. However we do not see any consideration in these documents of how the council planning requirement of what would amount to at least 50% of the Smithfield site being set aside for public open space will be addressed. This is a serious issue which needs to be resolved now, as this application does not just concern Phase 1 but the Hybrid Planning Application for the whole site.

2.12 *Detailed Area*: Even within the Detailed Area, where 429 homes are proposed, the proposed amount of public open space is insufficient. Based on a minimum of 2ha per 1000 residents, and using the occupant numbers provided in planning document (863 people in total, see Table 5 in Section 3.13), 1.73ha of new open space should be provided. The submitted proposal cites 16,491sqm of public open space (1.65ha) is to be provided in the detailed first phase. However, the applicant has included areas of public realm that do not meet BCC's definition of Public Open Space as stated in the aforementioned '*Public Open Space in New Residential Development SPD July 2007*'

"public open space" is defined as "open space, including playing fields, owned by the City Council or to which there is a public right of access, used by the public primarily for recreation purposes".

In addition, the National Planning Policy Framework's definition of public open space states: '*All open space of public value, including not just land, but also areas of water which offer important opportunities for sport and recreation and can act as a visual amenity.*' In section 3.23 of the submitted Planning Statement, Market Square, Moat Lane and Upper Smithfield Walk are included within the calculation of public open space. Whilst these areas have been designed with a high degree of landscaping, their primary purpose is not for recreation, but for retail and pedestrian movement/circulation. It is our view that only the Manor Square area (including the soft and hard landscaping) could be considered as being designed in accordance with the definition above. This area is 1.21ha in size (according to point 20 on page 93 of the Planning Statement, although our calculations put this area at 0.9ha if zones that have a primary purpose other than recreational such as footpaths are excluded), which amounts to only 70% of the minimum requirement of 2ha per 1000 residents, as set out in the aforementioned BCC's policy document '*Public Space in new residential development SPD July 2007*'.

2.2 BCC Green and Open Space Policies and Plans

In 2022, BCC released its City of Nature Plan (<https://naturallybirmingham.org/birmingham-city-of-nature-delivery-framework/>) which clearly highlighted the importance of urban green space to physical health and wellbeing, as well as the clear link between the paucity of green space in the city centre and high levels of multiple deprivation. Indeed its environmental justice map (<https://naturallybirmingham.org/environmental-justice/>) shows the Bordesley and Highgate Ward, where Smithfield is located, as severely lacking in green space (a red ward). Surely Smithfield presents a one-off opportunity to address this issue head-on – after all, where else is up to 40 acres of publicly owned land available in the city centre? However, we see no mention or consideration of either the council's approved City of Nature Plan in the planning application or the related Birmingham Open Space Assessment, October 2022, commissioned by Birmingham City Council (https://www.birmingham.gov.uk/downloads/file/24587/open_space_assessment_2022). This document was created to inform the council's decision-making processes in relation to open space provision and supports the implementation of planning policy when assessing proposals for development in Birmingham.

Opportunity for a New Approach

Before this planning application is taken any further, we would like to see a pause and further consultation with key green and open space stakeholders in the city, which should include other representatives such as the Birmingham Open Spaces Forum and the

Birmingham Tree People. We suggest that the consultation and revised plan for Smithfield should be framed around the following points:

- Make green and open space a priority for Smithfield – abandon the current piecemeal design approach and consider the landscape architecture first and in its entirety across the whole site rather than in phases, as currently depicted in Appendix 3 of the Planning Statement (bizarrely this appendix also implies that the design for Smithfield Park itself may be spread over two phases). Other large urban development projects in UK cities have adopted similar holistic strategies successfully, e.g. Mayfield in Manchester and QE Olympic Park in London. Buildings and infrastructure should be fitted to the landscaped open and green space, not the other way around.
- Build on the success of Smithfield as a venue for 2022 Commonwealth Games and Birmingham Pride. Create a flexible area of open and green space at the centre of the site without bottlenecks, a focal point where large crowds at open air events can assemble and dissipate safely. This can be done by improving open space interconnectivity, readily achieved by redesigning some of the areas currently included in the Outline Application, in particular Sub-Zone 3.2 and some residential plots in Zone 2.0. Buildings can be removed, reduced in size or even included within areas of green and open space, rather than placed outside them. The park should be expanded and rotation by 90 degrees considered so that it points towards the centre of the site. By placing transformative green space at the heart of Smithfield, green vistas could run throughout the site, for example up from Digbeth coach station and down from St Martin's church.
- Realise the significant economic benefits that green space in the city centre could yield. Assigning at least 25% of the site to green space would not only attract more visitors to the city centre but hugely increase the economic value of the surrounding development. It would also come with the public support, as evidenced by the CityPark4Brum campaign and the continuing support for more green space at Smithfield as shown in Lendlease's own recent consultation on these plans. As the Statement of Community Involvement shows (Document 3, sections 4.13 and 4.15), the greatest design concern was green space, with 67.5% of respondents wanting it increased. Given the proximity to national rail and coach transport hubs and the new HS2 station, providing a new park in the heart of Birmingham would be a significant addition to Birmingham's portfolio of attractions. The current scheme offers nothing extra to what the city already has with regards to attracting visitors or holding large events. The provision of a park is an economic investment, not a sacrifice.

Summary and Conclusion

Our campaign started long before the pandemic came upon us, but was already recognising local access to green space as important to all our citizens. Since 2020, the first hand evidence backed up by a huge body of research linking access to green space and public health has catapulted this essential component of wellbeing to the fore. The council's City of Nature Plan recognises the significant inequalities that exist in our city. This is a unique opportunity for Birmingham to be visionary, brave and bold, in keeping with its civic forebears. Victorian benefactors created our many green spaces of which we promote so frequently, but they are not in the centre of the city. In the 21st Century, let's now reconsider what is best for Birmingham's long term attractiveness and its citizens' health and wellbeing. This is our unique chance to create a green legacy at the historic site of Smithfield in the heart of Birmingham, one that surely matches the aspirations of its people.

Addendum

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The following is an additional comment that should be added to the CityPark4Brum objection submitted on 10th April 2024.

Members of the CityPark4Brum campaign group were invited to London by Lendlease to visit the Elephant Park development on Friday 12th April. We were given a presentation and shown around the park and its adjoining streets. Overall we were impressed with the park design, in particular the provision of play spaces for children. Lawned areas, mature trees and planting to facilitate biodiversity were also noted as positive features. As a neighbourhood park that caters for residents in homes adjoining the park who also pay for its upkeep, it appears to serve the community very well through its provision of green and open space.

It is important to highlight some differences between Elephant Park and the plan for Smithfield Park as currently outlined in the application:

1. Elephant Park is ca. 25% bigger than Smithfield Park (0.81 Ha compared to 0.65 Ha)
2. Elephant Park is less enclosed than Smithfield Park - its green spur and several entrance points make it relatively porous and visible from surrounding streets.
3. The local community in the London suburb of Elephant and Castle already has access to several other areas of public green space in close proximity to the park (e.g. within 500 metres), and in all directions. This contrasts with Smithfield, which only has Highgate park to the south east, which is located further away from the city centre.

In summary, while the elegant layout of Elephant Park could serve as a useful starting point in the design for Smithfield Park, our vision for a new city park for the heart of Birmingham at Smithfield is very different in that it is focused on grasping a unique opportunity to address the large green space deficit in the centre of Birmingham. Elephant Park, despite being larger and with fewer homes around it (3,208 in total), is essentially a neighbourhood park for local residents. In contrast, the Smithfield site, located in the heart of Birmingham in between the Bullring and Digbeth, will not only have more homes but also a much greater footfall due to city centre visitors and workers. Given these considerations, we would strongly argue that instead of Smithfield Park being smaller than Elephant Park, as is currently the case, it must be much larger and part of a holistic plan for extensive green and open space throughout the Smithfield site (25% of the land area). This site, which is mostly public land, is Birmingham's only opportunity to transform its city centre into one with a green heart, providing (i) a nature-based solution to the adverse effects of climate change (e.g. flooding and heat), (ii) help to the local economy through tourism and the creation of a large and flexible event space and (iii) a means to improve both the physical and mental health of its citizens.

Finally, we would like to note that the engagement from Lendlease with CityPark4Brum in the past few months has been very good, involving two in-person meetings and a trip to London. We look forward to continuing our engagement with Lendlease over open and green space provision as the plans for Smithfield move forward.