

Birmingham Development Plan

**Core Strategy Consultation Draft – Consultation Method and
Summary of Comments made**

Consultation Method

The consultation on the draft Core Strategy paper took place for 12 weeks and ended on the 18th March, 2011. In addition to the statutory consultation approach involving Libraries, Neighbourhood Offices and statutory and non statutory consultees on the City's mailing list several other actions were implemented:-

- Web page and electronic form/ online consultation via Objective.
- Presentations at Constituency Meetings and available to Ward meetings on request.
- Core Strategy themed Sustainability Forum evening. (see Appendix 1)
- Exhibitions at a number of venues with at least one in each Constituency.

Presentations involved a short explanation of the key proposals followed by question and answer session. Copies of the document, summary and questionnaire were available at these meetings. Freestanding posters were used to advertise events.

A number of locations across the City were chosen as venues for manned exhibitions. The following table sets out for each venue the number of people who talked with officer(s) about the Draft Core Strategy:-

Venue	Number of People who raised issues
Ward End Library	20
Sutton Council House	5
Erdington Library	8
Central Library	65
Acocks Green Library	15
Selly Oak Library	16
Asda One Stop	9
Walmley Library	10
Sainsbury's Northfield	13
Sheldon Library	33
Harborne Library	24
Asda Small Heath	6
Central Library	70
Weoley Castle Library	28
Kents Moat Library	10
Quinton Library	15
Morrisons Small Heath	60
Cocks Moors Woods Leisure Centre	20
Bartley Green Library	6
Balsall Heath Library	6

Two officers were on hand to interact with the public and encourage discussion, give out leaflets, questionnaires etc. The sessions were all-day except Bartley Green which was half day.

There were disparities between locations in terms of engagement with people. The two Central Library events were very well attended, however Sutton Town Hall attracted little response. The consultation at Bartley Green Library was in response to a request but the attendance was poor.

All the comments received are available on the Council's website (www.Birmingham.gov.uk/plan2031). A summary of the main points is set out below.

I Summary of Key Points

General

1. There were about 1350 comments from just over 200 respondents. Less than half of these actually sought a change to the Strategy. The rest are supporting or making general observations. In addition there was a petition of 1,868 signatures which was received relating to proposals for development at the North Worcestershire Golf Course.
2. The range of comments is large. There are comments on all of the city-wide policies – but the highest number of comments on a single policy is only 33 (on SP1).
3. Generally there are fewer comments on the Area policies but there are only a small number of policies with no comments at all. The City Centre and the South areas attracted more responses than the East or the North and West.
4. The following sections summarise the key issues that were raised during the consultation. Where appropriate reference is made to the relevant paragraph numbers or policies of the draft Strategy.

Vision/Objectives

5. The vision (paras 2.1 – 2.16) and objectives (para 3.1) were generally supported. Some housebuilders raised criticisms, aimed at paving the way for green belt land releases. There were also a number of suggestions for detailed changes/additions.

Housing Issues

6. Several housebuilders have pointed out that Core Strategies are supposed to have a 15 year life after adoption – which in Birmingham's case would mean an end date of 2028 or later rather than 2026.
7. Many housebuilders argue for higher housing numbers (policy SP2), in some cases sufficient to accommodate all the projected ONS household growth and

in other cases a figure in line with the RSS Panel Report. The Strategy is criticised for not having clear evidence to support the chosen housing figure.

8. The same housebuilders also argue for a green belt review and criticise the Strategic Housing Land Availability Assessment (SHLAA) for failing to consider green belt sites. In each case the conclusion is that a particular site should be released from the green belt for housing development.
9. There is also an argument from housebuilders that we should relax our density policies (policy SP31) because future demand will be focused on family housing rather than apartments.
10. Housebuilders have also criticised the affordable housing policy (policy SP27). The key point raised relates to the need for more flexibility to take account of viability issues. There is also criticism of the proposed policy because it proposes differential rates of provision on City Council-owned land. The targets are also questioned. Other points raised include the need for a clearer approach to specialist housing for the elderly. There was also some support for the policy (e.g. from the HCA).
11. Mature Suburbs attracted relatively few comments (policy SP30) – but almost all of these supported the principle that their character should be protected.
12. Only a few comments were received in relation to gypsies and travellers (policy SP29) and none of these challenge the basic approach.

Employment

13. Whilst there was support for the Core Employment Area (CEA) approach there were comments on specific proposed Core Employment areas, where respondents did query inclusion/boundaries. The Ardath Road site in Stirchley was felt not to be suitable especially as the site had not received any interest/offers for employment use for at least two years. Similarly the Denso site in Hall Green was not felt suitable. One consultee sought information on how CEA's were selected.
14. The Regional Investment Site (RIS) policy received support. However, some consultees wanted offices within RIS and also flexibility to consider other uses to offices where no demand was evident. Some felt that it should be explicit that supermarkets and retail uses are not acceptable within core employment areas. For large sites within RIS it was felt that there is a need for a sustainability champion to promote local energy networks, green business investment amongst others. Sustainable transport accessibility was also considered to be important and should be a theme throughout document including RIS policy. There was a comment that there is a need to ensure that the Strategic Rail Network (SRN) is not adversely affected by RIS proposals.
15. The employment land provision figures were broadly supported (policies SP2 and SP15) – but a number of comments seek a more flexible definition of 'employment', in line with PPS4 (as it was at the time) – i.e. including retail development and some consultees felt that other job creating development should be considered also.

- 16.** Whilst support was expressed for the Central Technology Belt , (CTB) there were concerns over the limited types of uses encouraged within the CTB. It was commented that the Birmingham Battery site is not suitable for high tech development. Need for an alternative corridor to Coventry/Solihull and Warwick. Sustainable development again promoted and sustainable accessibility.
- 17.** There was support for the protection of employment land, (SP16)., However flexibility in terms of land use was also sought and there were a few comments seeking housing development on employment sites and support for release of some poorer employment land for residential use. There was also a call for town centre uses to be considered on employment land to stimulate economic growth. There was support for the re-use of obsolete employment land and for flexibility to convert outdated office where no demand for reoccupation exists.
- 18.** Some comments seek a more positive reference to manufacturing within the City.
- 19.** It was suggested that a reference to the Enterprise Zone is needed.

Centres

- 20.** Most comments support the proposed network/hierarchy of centres (policy SP17). A small number suggest it should be expanded to include more local centres.
- 21.** There are several comments on the 'three centres' concept; (Policy SP17 and SP18) Walsall MBC and to a lesser extent Sandwell MBC object to the scale of development proposed for Perry Barr, there are differing views about Selly Oak, and one comment from Tesco suggesting that too much is proposed at the Meadway. Other comments seek retention of at least 80% of the open space at the Meadway, which would effectively reduce the level of development that could be accommodated there.
- 22.** There was general support for the level of comparison retail growth proposed. (policy SP18). But there were some concerns from House of Fraser about the direction of future growth in the city centre. A few comments (from retailers) seek a more flexible approach on convenience retailing (policy SP19).
- 23.** Some comments seek a stronger approach on hot food takeaways. Some also seek stronger policies to protect independent retailers from national chains (policies SP20 and 21).

Transport

- 24.** The overall approach on transport is broadly supported (policy SP33). The main issues relate to delivery and the evidence base (particularly from Centro and the Highways Agency). Many comments are locally specific and support particular initiatives (e.g. reopening Camp Hill line to passenger traffic)
- 25.** There are a number of comments seeking inclusion of a policy on cycling.

- 26.** A few comments seek a stronger approach to reducing carbon emissions from transport (policy SP35).
- 27.** Some comments draw attention to the abolition of national maximum car parking standards (policy SP38) – but there was not much comment on the car parking policy.

Waste

- 28.** The waste policies (policies SP42 – 44) were generally supported.

Open space, sport and recreation

- 29.** Several consultees supported the draft policy for open space, especially the threshold approach which specifies minimum requirements within certain distances. There was a call for greater protection of open space. However a few consultees thought that where alternative provision is offered this should be enough to support a proposal involving the loss and that policy should accord with PPG17. There were also calls for developing unused and private open space.
- 30.** There were also a number of comments suggesting a need for more allotments/opportunities for people to grow their own food (policy SP45) and also broadening the use of open space for micro farms.
- 31.** Overlap and linkages with SP11 Green Infrastructure were mentioned as were the possible use of other standards such as 'Woodland Accessibility Standards', 'Accessible Natural Greenspace Standards' and 'Local Nature Reserve provision standards'.
- 32.** Policy SP46; Sports Facilities was supported. However, there were quite a few detailed issues raised by Sport England, again relating more to the need for up-to-date assessments of need, to ensure an adequate evidence base to justify the loss of playing field land as much as to policy. They also sought a hierarchy of sporting facilities; an 18 month marketing period to establish demand for playing fields; and the need for stronger policy to secure community use of educational sports facilities.
- 33.** In terms of SP47, the need to reflect historic environment was mentioned, together with sustainable construction.
- 34.** The education (policy SP52) and health policies (policy SP51) attracted few comments but were broadly supported.

Area Sections

- 35.** There were only a few comments on the North and West. Walsall MBC's objection to the retail proposals at Perry Barr (policy NW5) is the most significant.

- 36.** Most of the comments on the City Centre are supportive – but raise issues of detail. There are concerns over the impact of High Speed Rail (HS2) on Eastside and some comments querying the scale/timing of further retail development.
- 37.** The two issues attracting most comment in the South were Selly Oak (policy S5) (different views) and Stirchley (policy S10) (support for the need to regenerate the centre, but different views on how to do it). There were only a handful of objections to the North Worcestershire Golf Course proposal (policy S8), including one from Sport England – but 181 standard letters of objection and a petition of 1,868 signatures were handed in subsequently.)
- 38.** There were not many comments on the East. The highest number was on Acocks Green (policy E4), mainly concerned with the quality of the residential suburbs, the local centre and traffic management. There was only one objection (from Friends of the Earth) to the Yardley Sewage Works proposal (policy E11) and one supporting comment.

Climate Change

- 39.** On climate change the main issue is a concern that the approach is over-ambitious and will impact on the viability of development. A more specific point is raised over whether when reference is made to the Code for Sustainable Homes (policy SP7) this is only to the energy element or the whole code (the Government's mandatory requirements currently relate only to the energy element). It should also be noted that there are quite a number of comments supporting the proposed approach
- 40.** A wide range of comments were received on low carbon energy (policy SP8). Some challenged the threshold, some suggested that the policy should place less emphasis on CHP and is more flexible and others questioned the policy on viability grounds. There was also some support.

Green Infrastructure

- 41.** The Green Infrastructure policy (policy SP11) was broadly supported but with a number of suggestions to strengthen it (e.g. in relation to trees and water features).
- 42.** The Environment Agency raised concerns over flood risk, water quality and the impact of climate change. (policies SP10 and SP11) Some of these concerns are shared by Natural England. Both conclude that further work is needed to address these issues (the Green Infrastructure Strategy and the ongoing SFR).

Sustainable Urban Neighbourhoods

- 43.** The SUN concept was generally supported (policy SP4) – but there were many comments querying how it will be implemented and what it will mean in practice.

- 44.** Friends of the Earth have suggested that the Strategy should include a definition of sustainable development (based on the principles included in the UK Sustainable Development Strategy and PPS1) in view of the importance attached to this in the Localism Bill.