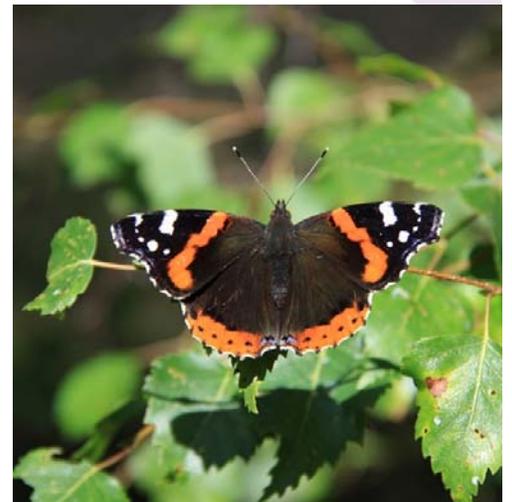


Birmingham City Council

**Sustainability Appraisal of the  
Development Management  
Development Plan Document**

**Publication Version (Regulation 19)**

Sustainability Report



**Report for**

Uyen-Phan Han  
Planning Policy Manager  
Birmingham City Council  
Planning and Development  
1 Lancaster Circus  
Queensway  
Birmingham  
B1 1TU

**Main contributors**

Robert Deanwood

**Issued by**



.....  
Robert Deanwood

**Approved by**



.....  
Pete Davis

**Wood**

Gables House  
Kenilworth Road  
Leamington Spa  
Warwickshire CV32 6JX  
United Kingdom  
Tel +44 (0) 1926 439 000

Doc Ref. L40761

h:\projects\40761 sa of bdp dm dpd\1 client\reports\sa  
report\publication sa\sa of the development management dpd  
publication version - october 2019 issued.docx

**Copyright and non-disclosure notice**

The contents and layout of this report are subject to copyright owned by Wood (© Wood Environment & Infrastructure Solutions UK Limited 2018) save to the extent that copyright has been legally assigned by us to another party or is used by Wood under licence. To the extent that we own the copyright in this report, it may not be copied or used without our prior written agreement for any purpose other than the purpose indicated in this report. The methodology (if any) contained in this report is provided to you in confidence and must not be disclosed or copied to third parties without the prior written agreement of Wood. Disclosure of that information may constitute an actionable breach of confidence or may otherwise prejudice our commercial interests. Any third party who obtains access to this report by any means will, in any event, be subject to the Third Party Disclaimer set out below.

**Third party disclaimer**

Any disclosure of this report to a third party is subject to this disclaimer. The report was prepared by Wood at the instruction of, and for use by, our client named on the front of the report. It does not in any way constitute advice to any third party who is able to access it by any means. Wood excludes to the fullest extent lawfully permitted all liability whatsoever for any loss or damage howsoever arising from reliance on the contents of this report. We do not however exclude our liability (if any) for personal injury or death resulting from our negligence, for fraud or any other matter in relation to which we cannot legally exclude liability.

**Management systems**

This document has been produced by Wood Environment & Infrastructure Solutions UK Limited in full compliance with the management systems, which have been certified to ISO 9001, ISO 14001 and OHSAS 18001 by LRQA.





# Non-Technical summary

## Introduction

This Non-Technical Summary (NTS) provides an overview of the Sustainability Appraisal (SA) Report produced as part of the SA of the Development Management DPD (DM DPD) that is currently being prepared by Birmingham City Council (the Council). The SA is being carried out on behalf of the Council by Wood<sup>1</sup> to help integrate sustainable development into the emerging DPD. This iteration of the SA report concerns the Publication Draft DM DPD.

The following sections of this NTS:

- ▶ provide an overview of the DM DPD;
- ▶ describe the approach to undertaking the SA of the DM DPD;
- ▶ summarise the findings of the SA of the DM DPD; and
- ▶ set out the next steps in the SA of the DM DPD including how to respond to the consultation on this SA Report.

## What is the Development Management DPD?

The Development Management DPD provides detailed policy guidance on a range of planning matters, covering environmental, social and economic topics, and will be a material consideration in the determination of planning applications. The DPD will be applicable to any location in the City, helping to deliver the BDP vision of Birmingham as *“an enterprising, innovative and green City that has delivered sustainable growth meeting the needs of its population”*, with an emphasis on supporting growth and creating high quality places. The objectives of the DPD mirror those of the BDP. The policies within the Development Management DPD reflect, and are in accordance with, the policies and guidance set out within the National Planning Policy Framework (NPPF) and the strategic spatial objectives and policies in the BDP. There are 16 proposed policies under the following themes:

### Environment and Sustainability

- ▶ DM1 Air quality
- ▶ DM2 Amenity
- ▶ DM3 Land affected by contamination, instability and hazardous substances
- ▶ DM4 Landscaping and trees
- ▶ DM5 Light pollution
- ▶ DM6 Noise and vibration

### Economy and network of centres

- ▶ DM7 Advertisements
- ▶ DM8 Places of worship and other faith related community facilities

---

<sup>1</sup> Formerly Amec Foster Wheeler, which was acquired in October 2017 by Wood Group.



- ▶ DM9 Day nurseries and early years provision

### Homes and Neighbourhoods

- ▶ DM10 Standards for residential development
- ▶ DM11 Houses in multiple occupation (HMO)
- ▶ DM12 Residential conversions and specialist accommodation
- ▶ DM13 Self and custom build housing

### Connectivity

- ▶ DM14 Highway safety and access
- ▶ DM15 Parking and servicing
- ▶ DM16 Telecommunications

## What is Sustainability Appraisal?

National planning policy<sup>2</sup> states that local plans should be prepared with the objective of contributing to the achievement of sustainable development. Sustainable development is that which seeks to secure net gains across economic, environmental and social objectives to meet the needs of the present without compromising the ability of future generations to meet their own needs.

The DM DPD should contribute to a sustainable future for the plan area. To support this objective, the Council is required to carry out a SA of the DPD<sup>3</sup>. SA is a means of ensuring that the likely social, economic and environmental effects of the DPD are identified, described and appraised and also incorporates a process set out under a European Directive<sup>4</sup> and related UK regulations<sup>5</sup> called Strategic Environmental Assessment (SEA). Where negative effects are identified, measures are proposed to avoid, minimise or mitigate such effects. Where any positive effects are identified, measures are considered that could enhance such effects. SA is therefore an integral part of the preparation of the DM DPD.

## How has the Development Management DPD been appraised?

**Table NTS 1** presents the range of SA Objectives that were developed in light of the baseline data, key sustainability issues identified for the City and with reference to the sustainability objectives developed for the SA/SEA of the Birmingham Development Plan and the SEA topic areas. These have been used to appraise the effects of DM DPD and to consider whether the Plan objectives, policies and proposals are sustainable.

---

<sup>2</sup> See paragraph 16 of the National Planning Policy Framework (Ministry for Housing, Communities and Local Government, 2019).

<sup>3</sup> The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.

<sup>4</sup> Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

<sup>5</sup> Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).



Table NTS 1 Sustainability Appraisal Objectives

SEA Directive Topic Area(s)	DM DPD Sustainability Appraisal Objectives
Material assets, soil	1. ENV1 Encourage development that optimises the use of previously developed land and buildings
Material assets	2. ENV2 To promote the application of high standards of design, construction and maintenance of buildings
Material assets, air quality, human health	3. ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel
Cultural heritage, landscape, biodiversity, flora and fauna	4. ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage, including resilient ecological networks able to meet the demands of current and future pressures.
Climatic Factors	5. ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly floodrisk management and reduction
Water, air quality, human health, material assets	6. ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management
Population and human health	7. ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all
Population and human health	8. ECON2 To help promote the vitality of local centres
Population and human health	9. ECON3 To promote the regeneration of areas across the City through appropriate development
Population and human health	10. ECON4 To encourage investment in learning and skills development
Population and human health	11. SOC1 To help ensure equitable access to community services and facilities
Population and human health	12. SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs
Population and human health	13. SOC3 To encourage development which promotes health and well-being
Population and human health	14. SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour
Population and human health	15. SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life

The DPD Objectives have been assessed for their compatibility with the SA Objectives.

The policies have been appraised against the SA Objectives using matrices to identify likely significant effects on the SA objectives. A qualitative scoring system has been adopted which is set out in **Table NTS 2**.

Table NTS 2 Scoring System Used in the Appraisal of the Draft DPD

Score	Description	Symbol
Significant Positive Effect	The proposed option/policy contributes significantly to the achievement of the objective.	++
Minor Positive Effect	The proposed option/policy contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed option/policy does not have any effect on the achievement of the objective	0
Minor Negative Effect	The proposed option/policy detracts from the achievement of the objective but not significantly.	-
Significant Negative Effect	The proposed option/policy detracts significantly from the achievement of the objective.	--
No Relationship	There is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.	~



Score	Description	Symbol
Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.	?

NB: where more than one symbol/colour is presented in a box it indicates that the appraisal has identified both positive and negative effects. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.

## What are the likely significant effects of the Development Management DPD?

The results of the SA of the DM policies indicate that there are likely to be largely positive or significantly positive effects resulting from implementation of the policies. This reflects the positive intent of the policies and the need to deal systematically and objectively with planning issues arising day-to-day across the City, as well as the experience accumulated through their ongoing implementation in the past through the UDP. More generally, the Development Management policies represent the lowest tier in a hierarchy of planning policies, adding local detail to implement the broader principles of policies within the NPPF and the BDP. As such they specifically address local issues and are designed to mitigate potential adverse effects associated with development.

No significant negative effects, either associated with specific sustainability objectives or cumulatively, have been identified. This contrasts with the scores attributed to the absence of a policy which are typically significantly negative, reflecting the clear need to systematically control development and the likely consequences of the absence of such a policy framework which is to the benefit of applicants, residents and the City as a whole.

Some policies have been identified as holding some uncertainty as to their precise effects in respect of meeting sustainability objectives. These apply principally to whether significant positive effects are likely to be fully realised in respect of matters such as sustainable travel and construction, or enhanced access by local communities to skills enhancement from the construction of education facilities, reflecting the case-by-case nature of individual developments and their particular circumstances. Nevertheless, the potential for the realisation of significant positive or positive effects exists.

## Proposed mitigation measures

No suggestions were made as to the specific wording of policies reflecting their positive intention. This reflects the positive scores, the absence of negative effects and the intention to use the policies in combination with the policies of the BDP, which for each policy are cross-referenced.

However, the following suggestions are made in respect of the presentation of the policies in order to make clearer how the policies will be implemented:

- ▶ Ensure that, wherever possible, the specific criteria against which the policy will be implemented and monitored are included.
- ▶ For each DM policy, provide further detail against the cited BDP policies on how these will work together.
- ▶ Set out more clearly in paragraph 1.10 of the DPD which matters are covered by the BDP, such as the control of various forms of retail development.

## In Summary

The SA of the DM DPD has scrutinised the basis for, content and likely effects of the proposed suite of policies. The SA has ensured that there has been consideration of the likely environmental effects of various options associated with each policy, demonstrating how the performance of the proposed policy is likely to lead to positive outcomes for the location of proposed developments and for the City as a whole.

## Comments

This Sustainability Appraisal Report which accompanies the Publication DM DPD is subject to consultation between Monday 11<sup>th</sup> November 2019 and Monday 23<sup>rd</sup> December 2019. Comments on this Report should be sent to:

Planning Policy  
Birmingham City Council  
Planning and Development  
1 Lancaster Circus  
Queensway  
Birmingham  
B1 1TU

[www.birmingham.gov.uk/DMB](http://www.birmingham.gov.uk/DMB)

## Next Steps

Following consultation and an analysis of the responses, the Council will produce a Submission Development Management DPD for scrutiny at an Examination in Public.



# Contents

<b>1.</b>	<b>Background</b>	<b>1</b>
1.1	Introduction	1
1.2	What is Sustainability Appraisal?	1
	Legislation	2
	National Planning Policy Framework and Guidance	2
1.3	Purpose of this SA Report	3
1.4	The Development Management DPD	3
	Evolution of the Development Management DPD	4
1.5	The Sustainability Appraisal process	7
1.6	Habitats Regulations Assessment	8
1.7	Compliance with the SEA Directive/Regulations	9
<b>2.</b>	<b>Review of Contextual Information</b>	<b>11</b>
2.1	Review of Plans, Policies and Programmes	11
2.2	Environmental, social and economic baseline and evolution without the Plan	17
<b>3.</b>	<b>Methodology</b>	<b>23</b>
3.1	The SA Framework	23
3.2	Appraisal Methodology	25
	DPD Objectives	25
	DPD Policies	25
3.3	Geographical and temporal scope	27
3.4	Mitigation	27
3.5	Who carried out the appraisal	28
3.6	Difficulties encountered	28
<b>4.</b>	<b>Appraisal of the Publication Development Management DPD and Reasonable Alternatives</b>	<b>29</b>
4.1	Compatibility between the DPD Objectives and the SA Objectives	29
4.2	Policies and alternatives	31
4.3	Summary of results and the reasons for selecting/rejecting the alternatives	32
4.4	Summary of the Habitats Regulations Assessment (HRA)	42
4.5	Proposed mitigation measures	42
4.6	Uncertainties and risks	43
<b>5.</b>	<b>Next steps</b>	<b>45</b>
5.1	Preparation of the Submission Development Management DPD	45
5.2	Finalising the SA Report and Post Adoption Statement	45



5.3	Monitoring Requirements	45
5.4	Quality Assurance Checklist	47

---

Table 1.1	Changes to the Suite of Policies from the Regulation 18 Document to the Preferred Options Document	5
Table 1.2	Compliance with the requirements of the SEA Directive	9
Table 2.1	Plans, Programmes and Strategies Relevant to the SA of the DM DPD	12
Table 2.2	Baseline summary and issues relevant to the Development Management DPD	17
Table 3.1	Sustainability Objectives, Guide Questions and Indicators	23
Table 3.2	Compatibility matrix	25
Table 3.3	Appraisal matrix	26
Table 3.4	Appraisal Scoring system	26
Table 4.1	Compatibility between the Development Management DPD Objectives and the SA Objectives	30
Table 4.2	Summary of the results of the appraisal of the preferred policy option	32

---

Figure 1.1	The relationship between the SA process and Local Plan preparation	8
------------	--	---

---

Appendix A	Policy Appraisal	
Appendix B	Review of Plans, Policies and Strategies and their use in the Sustainability Objectives	
Appendix C	Scoping Report Baseline	
Appendix D	Consultation Responses on the Scoping Report update (August 2018) and the Council's Response	
Appendix E	Consultation Responses on the Scoping Report (2014) and the Council's Response	
Appendix F	Regulation 18 (Issues & Options) Consultation Responses	
Appendix G	Regulation 18 (Preferred Options) Consultation Responses	



# 1. Background

## 1.1 Introduction

- 1.1.1 The Birmingham Development Plan<sup>6</sup> (BDP) was adopted by Birmingham City Council (the Council) in 2017. The BDP provides the strategic planning policies for over 51,100 new homes and substantial amounts of employment land, retail and office development to be delivered by 2031. The Council has also been preparing the Development Management Development Plan Document (DM DPD). It will provide detailed planning policies for specific types of development and support the implementation of the BDP.
- 1.1.2 The Council issued an initial draft Development Management DPD in March 2015<sup>7</sup>. Following an analysis of the consultation responses and the adoption of the BDP, the Council prepared a Draft Development Management DPD, consulted on as Preferred Options version in January – February 2019 and now as a Publication version.
- 1.1.3 Wood Environment and Infrastructure Solutions Ltd. (Wood) was been commissioned by the Council to undertake a Sustainability Appraisal (SA) of the Development Management DPD. The SA appraises the environmental, social and economic performance of the Development Management DPD and any reasonable alternatives.
- 1.1.4 This report presents the findings of the SA of the Publication Draft Development Management DPD. It sets out the results of the appraisal of the DPD's sustainability performance using a SA framework developed in the Scoping Report<sup>8</sup>.
- 1.1.5 This Sustainability Appraisal Report accompanies the Publication Draft Development Management DPD and is subject to consultation between Monday 11<sup>th</sup> November 2019 and Monday 23<sup>rd</sup> December 2019. Comments on this Report should be sent to:

Planning Policy  
Birmingham City Council  
Planning and Development  
1 Lancaster Circus  
Queensway  
Birmingham  
B1 1TU

[www.birmingham.gov.uk/DMB](http://www.birmingham.gov.uk/DMB)

## 1.2 What is Sustainability Appraisal?

- 1.2.1 Sustainability Appraisal (SA) is a process whereby the environmental, social and economic aspects of a proposed plan, policy or programme (and any reasonable alternatives) are systematically identified, described and evaluated. In doing so, it will help to inform the selection of options and identify measures to avoid, minimise or mitigate any potential negative effects that may arise from

---

<sup>6</sup> Birmingham City Council (January 2017) *Birmingham Development Plan: Part of Birmingham's Local Plan, Planning for sustainable growth.*

<sup>7</sup> Birmingham City Council (June 2015) *Regulation 18 Consultation on Development Management DPD*

<sup>8</sup> Birmingham City Council (2018) *Sustainability Appraisal of the Development Management DPD: Scoping Report*

the plan, policy or programme's implementation as well as opportunities to improve the contribution towards sustainability.

## Legislation

- 1.2.2 Under Section 19(5) of the Planning and Compulsory Purchase Act (PCPA) 2004, a local planning authority (LPA) is required to:
- a) carry out an appraisal of the sustainability of the proposals in each development plan document;
  - b) prepare a report of the findings of the appraisal.
- 1.2.3 The development plan documents referred to in Section 19 (5a) include Local Plans.
- 1.2.4 In developing the DPDs, LPAs must also address the requirements of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the SEA Directive, and its transposing regulations.<sup>9</sup> In the case of the Development Management DPD, following screening against the requirements of the SEA Directive, the Council considered that it was likely to have significant effects, and in consequence, this SA includes meeting the requirements of the SEA Directive and implementing regulations.
- 1.2.5 Section 39 of the PCPA requires that the authority preparing a DPD must do so "with the objective of contributing to the achievement of sustainable development". On this, it echoes Article 1 of the SEA Directive, which states that the objective of SEA is:
- "to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development".*

## National Planning Policy Framework and Guidance

- 1.2.6 At paragraph 16, the National Planning Policy Framework (NPPF) (2019)<sup>10</sup> sets out that local plans should be prepared with the objective of contributing to the achievement of sustainable development.<sup>11</sup> In this context, paragraph 32 of the NPPF reiterates the requirement for SA/SEA as it relates to local plan preparation:
- "Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements.<sup>12</sup> This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."*

<sup>9</sup> [Environmental Assessment of Plans and Programmes Regulations 2004](#) (the 'Strategic Environmental Assessment Regulations'), which implement the requirements of the [European Directive 2001/42/EC](#) (the 'Strategic Environmental Assessment Directive')

<sup>10</sup> Ministry of Housing, Communities and Local Government (2019) *National Planning Policy Framework* <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>11</sup> This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act, 2004)

<sup>12</sup> The reference to relevant legal requirements in the NPPF relates to Strategic Environmental Assessment.

- 1.2.7 The Planning Practice Guidance (Plan-making paragraph 03713) also makes clear that SA plays an important role in demonstrating that a local plan reflects sustainability objectives and has considered reasonable alternatives. In this regard, SA will help to ensure that a local plan is *"justified"*, a key test of soundness that concerns the extent to which the plan provides an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. The PPG also states<sup>14</sup> that *"The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings"* and leads to a series of SA Reports being completed to accompany each stage of the plan preparation.
- 1.2.8 Therefore current legislation, planning policy and guidance all make clear that compliance with requirements of the SEA Directive through the completion of an integrated SA is critical to ensuring that a plan is found sound at Examination and can then be formally adopted.

### 1.3 Purpose of this SA Report

- 1.3.1 Specifically, this SA Report sets out:
- ▶ an overview of the Publication Draft Development Management DPD;
  - ▶ a review of relevant international, national, regional, sub-regional and local plans, policies and programmes;
  - ▶ baseline information for the DPD area across key sustainability topics;
  - ▶ key economic, social and environmental issues relevant to the appraisal of the Publication Draft Development Management DPD;
  - ▶ the approach to undertaking the appraisal of the Publication Draft Development Management DPD;
  - ▶ the findings of the appraisal of the Publication Draft Development Management DPD; and
  - ▶ conclusions and an overview of the next steps in the SA process.

### 1.4 The Development Management DPD

- 1.4.1 The Development Management DPD provides detailed policy guidance on a range of planning matters, covering environmental, social and economic topics, and will be a material consideration in the determination of planning applications. The DPD will be applicable to any location in the City, helping to deliver the BDP vision of Birmingham as *"an enterprising, innovative and green City that has delivered sustainable growth meeting the needs of its population"*, with an emphasis on supporting growth and creating high quality places. The DPD will support the delivery of the BDP objectives, namely:
- ▶ To develop Birmingham as a City of sustainable neighbourhoods that are safe, diverse and inclusive with locally distinctive character.
  - ▶ To make provision for a significant increase in the City's population.
  - ▶ To create a prosperous, successful and enterprising economy with benefits felt by all.

---

<sup>13</sup> Planning Practice Guidance, Reference ID 61-037-20190315 (Revision date: 15/03/2019)

<sup>14</sup> Planning Practice Guidance, Strategic environmental assessment and sustainability appraisal, Paragraph: 018 Reference ID: 11-018-20140306 (Revision date: 06 03 2014)

- ▶ To promote Birmingham's national and international role.
- ▶ To provide high quality connections throughout the City and with other places including encouraging the increased use of public transport, walking and cycling.
- ▶ To create a more sustainable City that minimises its carbon footprint and waste and promotes brownfield regeneration while allowing the City to grow.
- ▶ To strengthen Birmingham's quality institutions and role as a learning City and extend the education infrastructure securing significant school places.
- ▶ To encourage better health and well-being through the provision of new and existing recreation, sport and leisure facilities linked to good quality public open space.
- ▶ To protect and enhance the City's heritage assets and historic environment.
- ▶ To conserve and enhance Birmingham's natural environments, allowing biodiversity and wildlife to flourish.
- ▶ To ensure that the City has the infrastructure in place to support its future growth and prosperity.

### Evolution of the Development Management DPD

1.4.2 The DM DPD has been subject to an extensive process of consultation that has played an important role in helping to shape the policies in the plan. The Council has undertaken two key consultation exercises prior to publication of the Council's Publication version DM DPD in October 2019.

Stage 1 - Initial Consultation Document (June 2015)

Stage 2 - Preferred Options Consultation Document (January 2019)

Stage 3 - Publication version Consultation (October 2019 - this stage)

1.4.3 The first two stages of consultations are considered to be work undertaken as 'preparation of a local plan' under Regulation 18 of the Regulations. The reason for the large time gap between the first consultation in 2015 and the second consultation in 2019 was due delays around the adoption of the Birmingham Development Plan (BDP). The BDP Inspector issued his final report in March 2016. The Government placed a holding direction on the adoption of the BDP until November 2016. After the holding direction was lifted the Birmingham City Council sought to adopt the BDP as soon as practicable, which was at its Council meeting of January 2017.

1.4.4 Consultation on the Issues and Options version of the DM DPD (Regulation 18 Stage) took place in Summer 2015. In total, 26 respondents provided a total of 91 responses, which have been taken into consideration as the policies in the DPD were prepared. Relevant responses are summarised in **Appendix E**.

1.4.5 In light of the consultation and re-appraisal of the relationship between the emerging DM DPD and the adopted BDP, various policies have been deleted and others merged (**Table 1.1**).

Table 1.1 Changes to the Suite of Policies from the Regulation 18 Document to the Preferred Options Document

Proposed policy in October 2015 Consultation	How this was dealt with in the Preferred Options Draft Document
Hot food Takeaways (DM01)	Covered by DM2 Amenity, DM6 Noise and Vibration, DM13 Highway safety and access, DM14 Parking and Servicing
Sheesha Lounges (DM02)	Covered by DM2 Amenity, DM6 Noise and Vibration, Highway safety and access, DM14 Parking and Servicing
Restaurants/ Cafes/ Pubs (DM03)	Covered by DM2 Amenity, DM6 Noise and Vibration, Highway safety and access, DM14 Parking and Servicing
Private Hire and Taxi Booking Offices (DM08)	Covered by DM2 Amenity, DM6 Noise and Vibration, Highway safety and access, DM14 Parking and Servicing
Education Facilities – Use of Dwellings Houses (DM09)	Covered by DM9 Places of worship and faith related community uses, DM10 Day nurseries and early years provision, BDP Policy TP36 Education
Education Facilities Non-Residential Properties (DM10)	Covered by DM9 Places of worship and faith related community uses, DM10 Day nurseries and early years provision, BDP Policy TP36 Education
Hotels and Guest Houses (DM11)	Not considered necessary. Majority of impacts covered by DM2 Amenity, DM6 Noise and Vibration, DM13 Highway safety and access, DM14 Parking and Servicing
Flat Conversions (DM14)	Not considered necessary. Majority of impacts covered by DM2 Amenity, DM6 Noise and Vibration, DM13 Highway safety and access, DM14 Parking and Servicing
Hostels and Residential Homes (DM15)	Not considered necessary. Majority of impacts covered by DM2 Amenity, DM6 Noise and Vibration, DM13 Highway safety and access, DM14 Parking and Servicing
Planning Obligations (DM17)	Covered by BDP Policy TP47 Developer contributions
Aerodrome Safety (DM19)	Covered by ODPM Circular1/2003
Design (DM23)	Covered by BDP Policy PG Place-making

1.4.6

Consultation on the Preferred Options Draft Development Management DPD took place from 4<sup>th</sup> February to 29<sup>th</sup> March 2019. Some 69 individuals/ organisations responded generating 650 separate comments; general Comments regarding Development Management DPD and SA are recorded in **Appendix G** along with where there have been refinements made through amended wording to the proposed policies in response to the comments made. Policies within the Homes and Neighbourhood section have been expanded from three to four as follows:

Preferred Options Plan Homes & Neighbourhoods policies	Publication Plan Homes & Neighbourhoods policies
DM10 Houses in multiple occupation and other residential accommodation	DM10 Standards for residential development
DM11 Standards for Residential development	DM11 Houses in multiple occupation (HMO)

DM12 Self and custom build housing

DM12 Residential conversions and specialist accommodation

DM13 Self and custom build housing

- 1.4.7 Changes to the structure of the policies and their content in response to comments have been taken into account in the appraisal.
- 1.4.8 The only comment on the SA of the Preferred Options document noted the need to include specific reference to the HRA produced for the BDP. This omission has been corrected in this document (see section 1.6)
- 1.4.9 The proposed policies within the Publication Draft Development Management DPD reflect, and are in accordance with, the policies and guidance set out within the National Planning Policy Framework (NPPF) and the strategic spatial objectives and policies in the BDP. There are 16 proposed policies under the following themes:

#### **Environment and Sustainability**

- ▶ DM1 Air quality
- ▶ DM2 Amenity
- ▶ DM3 Land affected by contamination, instability and hazardous substances
- ▶ DM4 Landscaping and trees
- ▶ DM5 Light pollution
- ▶ DM6 Noise and vibration

#### **Economy and network of centres**

- ▶ DM7 Advertisements
- ▶ DM8 Places of worship and other faith related community facilities
- ▶ DM9 Day nurseries and early years provision

#### **Homes and Neighbourhoods**

- ▶ DM10 Standards for residential development
- ▶ DM11 Houses in multiple occupation (HMO)
- ▶ DM12 Residential conversions and specialist accommodation
- ▶ DM13 Self and custom build housing

#### **Connectivity**

- ▶ DM14 Highway safety and access
- ▶ DM15 Parking and servicing
- ▶ DM16 Telecommunications.

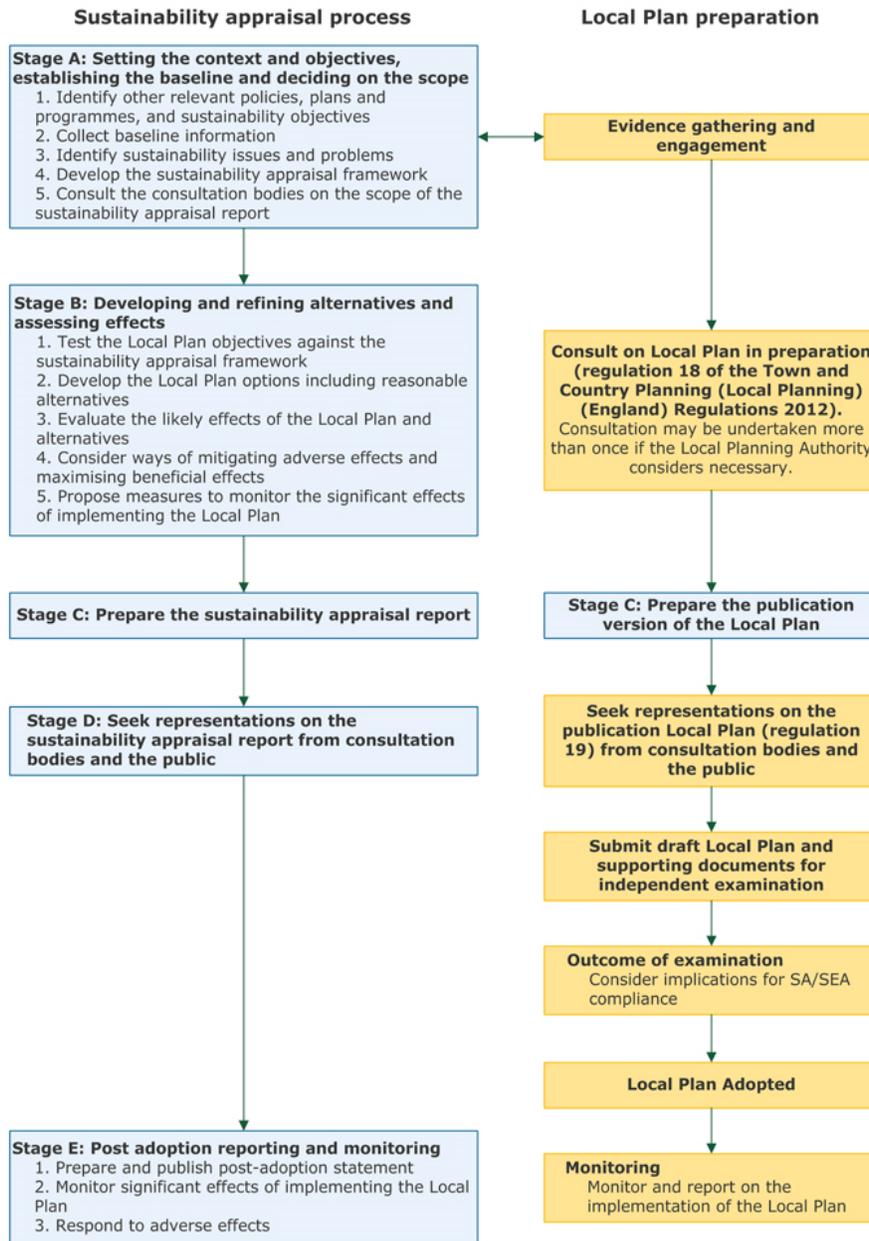
## 1.5 The Sustainability Appraisal process

- 1.5.1 The appraisal of the DM DPD is an integral part of the plan preparation and has five sequential stages. These are highlighted in **Figure 1.1** below together with links to the development of the DPD.
- 1.5.2 The first stage (**Stage A**) led to the production of a SA Scoping Report<sup>15</sup>. Informed by a review of other relevant policies, plans and programmes as well as baseline information and the identification of key sustainability issues affecting the City, the Scoping Report set out the proposed framework for the appraisal of the DPD (termed the SA Framework).
- 1.5.3 Consultation on the Scoping Report ran from Friday 12<sup>th</sup> December 2014 until Friday 22<sup>nd</sup> January 2015 and from 21<sup>st</sup> May and 29<sup>th</sup> June 2018. Responses were received to the consultation from the statutory SEA consultation bodies (Natural England, Historic England and the Environment Agency). Responses related to various aspects of the Scoping Report and resulted in amendments to the SA Framework. **Appendix D** contains a schedule of the consultation responses received on the Scoping Report, the Council's response and the subsequent action taken.
- 1.5.4 **Stage B** of the SA process is iterative and involves the development and refinement of the DPD by testing the sustainability strengths and weaknesses of the emerging policy options. An SA of the Issues and Options and Preferred Options versions of the DM DPD (Regulation 18 Stage) were completed and subject to consultation (along with the draft DPD) in summer 2015 and winter 2019 respectively. **Appendix F** and **G** contains a schedule of the consultation responses received.
- 1.5.5 At **Stage C**, a final SA Report will be prepared to accompany the publication draft DPD. As with this SA Report, it will be available for consultation alongside the DPD itself. In some instances following consultation, further amendments are made to the SA Report prior to submission and consideration by an independent planning inspector (**Stage D**).
- 1.5.6 Following Examination in Public, and subject to any significant changes to the draft DPD that may require appraisal, the Council will issue a Post Adoption Statement as soon as reasonably practicable after the adoption of the DPD. This will set out the results of the consultation and SA processes and the extent to which the findings of the SA have been accommodated in the adopted DPD. During the period covered by the DPD, the Council will monitor its implementation and any significant social, economic and environmental effects (**Stage E**).

---

<sup>15</sup> Birmingham City Council (2018) *Sustainability Appraisal of the Development Management DPD: Scoping Report*

Figure 1.1 The relationship between the SA process and Local Plan preparation



Source: Ministry of Housing, Communities and Local Government (MHCLG) (2019) *Planning Practice Guidance Strategic Environmental Assessment and Sustainability Appraisal* (Paragraph: 013 Reference ID: 11-013-20140306). Available at <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

## 1.6 Habitats Regulations Assessment

1.6.1 Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations') requires that competent authorities assess the potential impacts of land use plans on the Natura 2000 network of European protected sites<sup>16</sup> to determine whether there will be any 'likely

<sup>16</sup> Strictly, 'European sites' are any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a 'Site of Community Importance' (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been

significant effects' (LSE) on any European site as a result of the plan's implementation (either alone or 'in combination' with other plans or projects); and, if so, whether these effects will result in any adverse effects on that site's integrity with reference to the site's conservation objectives. The process by which the effects of a plan or programme on European sites are assessed is known as 'Habitats Regulations Assessment' (HRA)<sup>17</sup>.

- 1.6.2 In accordance with the Habitats Regulations, what is commonly referred to as a HRA screening exercise has been undertaken to identify the likely impacts of the emerging Local Plan upon European sites, either alone or 'in combination' with other projects or plans, and to consider whether these effects are likely to be significant. Where the possibility of significant effects could not be excluded, a more detailed Appropriate Assessment<sup>18</sup> (AA) has been carried out to determine whether these effects would adversely affect the integrity of European sites.
- 1.6.3 The HRA is reported separately from the SA of the DPD (although a summary of the findings is included in **Section 4.4** of this report) but importantly has helped to inform the appraisal process, particularly in respect of the potential effects of proposals on biodiversity.

## 1.7 Compliance with the SEA Directive/Regulations

- 1.7.1 This Sustainability Appraisal Report has been compiled with reference to the legal requirements of the SEA Directive and associated Regulations. **Table 1.2** sets out where and how the requirements of the SEA Directive have been addressed in producing this SA Report.

Table 1.2 Compliance with the requirements of the SEA Directive

Annex I, SEA Directive requirement	Where covered in the SA Report
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans.	Sections 1 and 2
b) The relevant aspects of the current states of the environment and the likely evolution thereof without implementation of the plan or programme.	Section 2
c) The environmental characteristics of areas likely to be significantly affected.	Section 2
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance.	Section 2
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 2
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Section 4

identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the 'new wild birds directive') are applied; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Conservation of Habitats and Species Regulations 2017 are applied a matter of Government policy when considering development proposals that may affect them (NPPF para 176). 'European site' is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites.

<sup>17</sup> See: [https://www.birmingham.gov.uk/download/downloads/id/1523/sub6\\_pre-submission\\_habitat\\_regulations\\_assessment\\_2013.pdf](https://www.birmingham.gov.uk/download/downloads/id/1523/sub6_pre-submission_habitat_regulations_assessment_2013.pdf)

<sup>18</sup> 'Appropriate Assessment' has been historically used as an umbrella term to describe the process of assessment as a whole. The whole process is now more usually termed 'Habitats Regulations Assessment' (HRA), and 'Appropriate Assessment' is used to indicate a specific stage within the HRA.

g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan.	Section 4
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information.	Section 4
i) A description of measures envisaged concerning monitoring.	Section 5
j) A non-technical summary of the information provided under the above headings.	This Report

## 2. Review of Contextual Information

### 2.1 Review of Plans, Policies and Programmes

- 2.1.1 One of the first steps in undertaking SA is to identify and review other relevant plans and programmes that could influence the DM DPD. The requirement to undertake a plan and programme review and to identify the environmental and wider sustainability objectives relevant to the plan being assessed is set out in the SEA Directive. An 'environmental report' required under the SEA Directive should include: *"An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"* to determine *"the environmental protection objectives, established at international (European) community or national level, which are relevant to the plan or programme ... and the way those objectives and any environmental considerations have been taken into account during its preparation"* (Annex 1 (a), (e)).
- 2.1.2 Plans and programmes relevant to the DPD may be those at an international/ European, UK, national, regional, sub-regional or local level, as relevant to the scope of the document. The review of relevant plans and programmes aims to identify the relationships between the DPD and these other documents, i.e. how the DPD could be affected by the other plans' and programmes' aims, objectives and/or targets, or how it could contribute to the achievement of their sustainability objectives. The review also ensures that the relevant environmental protection and sustainability objectives are integrated into the SA. Additionally, reviewing plans and programmes can provide appropriate information on the baseline for the plan area and help identify the key sustainability issues.
- 2.1.3 The relationship between various policies, plans, programmes and environmental protection objectives may influence the DM DPD. The relationships are analysed to help:
- ▶ identify any external social, environmental or economic objectives that should be reflected in the SA/SEA process;
  - ▶ identify external factors that may have influenced the preparation of the plan; and
  - ▶ determine whether the policies in other plans and programmes might lead to cumulative or synergistic effects when combined with policies in the plan.
- 2.1.4 This process enables the DM DPD to take advantage of any potential synergies and to respond to any inconsistencies and constraints. The plans and programmes to be considered include those at the international, national, regional and local scale.
- 2.1.5 The review aims to identify the relationships between the DM DPD and these other documents i.e. how the DPD could be affected by the other plans' and programmes' aims, objectives and/or targets, or how it could contribute to the achievement of any environmental and sustainability objectives. An understanding of the plans and programmes alongside which the DM DPD sits is important in developing a baseline approach to the assessment. It is also a valuable source of information to support the completion of the social, economic and environmental baseline and aid the determination of the key issues. The completed review of plans and programmes will also be used to provide the policy context for the subsequent assessment process and help to inform the development of objectives that comprise the assessment framework.
- 2.1.6 The SA Scoping Report (2015 and 2018 update) included a review of plans and programmes, consistent with the requirements of the SEA Directive, and which was used to inform the development of the SA Framework. Table 2.1 lists the plans, programmes and strategies at international, national, regional and local scale reviewed within the Scoping Report, whilst

**Appendix B** sets out where the content of the plans, programmes and strategies reviewed have been translated into the Sustainability Objectives.

Table 2.1 Plans, Programmes and Strategies Relevant to the SA of the DM DPD

International
Council of Europe (2006) European Landscape Convention
Council of Europe (1985) Convention on the Protection of the Architectural Heritage of Europe
EU (2007) Floods Directive
EU (1991) Urban Waste Water Treatment Directive.
EC (2007) Together for Health: A Strategic Approach for the EU 2008-2013
The Pan-European Biological and Landscape Diversity Strategy (1995)
EU Directive on the Conservation of Wild Birds (79/409/EEC)
EU Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC) & Subsequent Amendments
EU Directive on Waste (Directive 75/442/EEC, 2006/12/EC 2008/98/EC as amended)
EU Packaging and Packaging Waste Directive (94/62/EC)
EU (1996) Ambient Air Quality Assessment and Management (96/62/EC, Air Quality Framework Directive).
EU (1998) Aarhus Convention
EU Drinking Water Directive (98/83/EC)
EU Directive on the Landfill of Waste (99/31/EC)
EU (2000) Directive on Establishing a Framework for Community Action in the Field of Water Policy (2000/60/EC, The Water Framework Directive).
EU 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (SEA Directive)
EU (2005) Clean Air Strategy.
EU (2010) The Industrial Emissions Directive
UNFCCC (1997) Kyoto Protocol to the UN Framework Convention on Climate Change.
UNFCCC (2009) Copenhagen Accord (Climate Change).
National
CLG (2019) National Planning Policy Framework (NPPF)
DCLG (2011) The Localism Act
DCLG (2011) The Community Infrastructure Levy Regulations
DCLG (2014) Planning Policy for Traveller Sites (updated August 2015)
DCLG (2019) Planning Practice Guidance
DCLG (2014) National Planning Policy for Waste
DCLG (2014) Written Statement on Sustainable Drainage Systems
DCLG (2017) Fixing Our Broken Housing Market
DECC (2008) UK Climate Change Act 2008.
DCMS (2007) Heritage Protection for the 21 <sup>st</sup> Century.
DCMS (2013) <i>Scheduled Monuments &amp; Nationally Important but Non-Scheduled Monuments</i>
DCMS (2016) The Culture White Paper
DCMS (2017) Heritage Statement
Defra (2007) Guidance for Local Authorities on Implementing Biodiversity Duty



Defra (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (Volume 2).

Defra (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

Defra (2007) Strategy for England's Trees, Woods and Forests

Defra (2008) Future Water, the Government's Water Strategy for England

Defra (2009) Safeguarding our Soils: A Strategy for England

Defra (2011) Natural Environment White Paper; The natural choice: securing the value of nature

Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem

Defra (2011) Review of Waste Policy in England

Defra & HM Government (2011) Water White Paper; Water for Life

Defra & Environment Agency (2001) National Flood and Coastal Erosion Risk Management Strategy for England

DfT (2008) Delivering a Sustainable Transport System (DaSTS).

English Heritage (2008) Conservation Principles, Policies and Guidance

English Nature (2006) Climate Change Space for Nature

Environment Agency (2009) Water for people and the environment - Water resources strategy for England and Wales.

Environment Agency (2011) The National Flood and Coastal Erosion Risk Management Strategy for England

Forestry Commission (2005): Trees and Woodlands Nature's Health Service

HM Government (1979) Ancient Monuments and Archaeological Areas Act

HM Government (1981) Wildlife and Countryside Act

HM Government (1990) Planning (Listed Building and Conservation Areas) Act

HM Government (2000) Countryside and Rights of Way Act 2000

HM Government (2003) Sustainable Energy Act

HM Government (2003) The Water Environment (Water Framework Directive) (England and Wales) Regulations

HM Government (2004 and revised 2006) Housing Act

HM Government (2005) Securing the Future – the UK Sustainable Development Strategy

HM Government (2006) The Natural Environment and Rural Communities Act 2006

HM Government (2006) The Natural Environment and Rural Communities (NERC) Act 2006

HM Government (2008) The Climate Change Act 2008

HM Government (2008) The Planning Act

HM Government (2009) The UK Renewable Energy Strategy

HM Government (2010) The Government's Statement on the Historic Environment for England

HM Government (2010) The Air Quality Standards 2010

HM Government (2010) Flood and Water Management Act

HM Government (2010) White Paper: Healthy Lives, Healthy People: Strategy for Public Health in England

HM Government (2011) The Localism Act

HM Government (2011) Water for Life: White Paper

HM Government (2011) Carbon Plan: Delivering our Low Carbon Future

HM Government (2013) The Community Infrastructure Levy (Amendment) Regulations 2013

HM Government (2014) Water Act 2014

HM Government (2015) Water Framework Directive (Standards and Classification) Directions (England and Wales) 2015.

HM Government (2015) Government Response to the Committee on Climate Change.

HM Government (2016) Environmental Permitting (England and Wales) Regulations 2016.

HM Government (2016) Housing and Planning Act 2016

HM Government (2017) The Conservation of Habitats and Species Regulations 2017

HM Government (2006) Climate Change The UK Programme

## Regional

Severn Trent Water Resources Management Plan (2019)

Energy Capital (2018) a Regional Approach to Clean Energy Innovation

Environment Agency Humber River Basin Management Plan (2015)

Environment Agency

The Tame, Anker and Mease Management Catchment (2017)

Environment Agency Trent Catchment Flood Management Plan (2010)

Environment Agency (2015) Severn River Basin District River Basin Management Plan

The Greater Birmingham and Solihull Local Enterprise Partnership Strategy (2013)

Greater Birmingham & Solihull Local Enterprise Partnership (2016) Strategic Economic Plan 2016-2030

Natural England (2012) National Character Area profile no. 67: Cannock Chase and Cank Wood

Natural England (2012) National Character Area profile no. 97: Arden

Transport for West Midlands (2017) 2026 Delivery Plan for Transport

Environment Agency (2009) A Water Resources Strategy Regional Action Plan for the West Midlands Region

Forestry Commission (2004) West Midlands Regional Forestry Framework

Peter Brett Associates LLP (2014) GBSLEP Joint Strategic Housing Study

Greater Birmingham and Solihull LEP, Strategic Economic Plan 2016-2030

West Midlands Combined Authority (2017) West Midlands Roadmap to a Sustainable Future in 2020 (Annual Monitoring Report)

West Midlands Combined Authority (2017) Thrive West Midlands – An Action Plan to drive better mental health and wellbeing in the West Midlands

## Local

Birmingham City Council (1994) Handsworth, Sandwell and Soho: Areas of Restraint

Birmingham City Council (1996) Shopfronts design guide

Birmingham City Council (1999) Location of advertisement hoardings

Birmingham City Council (1999) Wheelwright Road: Area of Restraint

Birmingham City Council (1999) Regeneration through Conservation SPG

Birmingham City Council (2000) Parking of vehicles at commercial and industrial premises adjacent to residential property

Birmingham City Council (2000) Floodlighting of sports facilities, car parks and secure areas

Birmingham City Council (2001) Specific needs residential uses SPG

Birmingham City Council (2001) Places for living

Birmingham City Council (2001) Places for all

Birmingham City Council (2001) Affordable Housing SPG

Birmingham City Council (2003) High Places

Birmingham City Council (2004) Archaeology Strategy SPG

Birmingham City Council (2005) Developing Birmingham: An Economic Strategy for the City 2005-2015

Birmingham City Council (2006) Air Quality Action Plan

Birmingham City Council (2006) Municipal Waste Management Strategy  
Birmingham City Council (2006) The Future of Birmingham's Parks and Open Space Strategy  
Birmingham City Council (2006) Loss of industrial land SPD  
Birmingham City Council (2006) Access for People with Disabilities SPD  
Birmingham City Council (2006) 45 Degree Code for Residential Extensions  
Birmingham City Council (2007) Extending your home: Home extensions guide  
Birmingham City Council (2007) Public open space in new residential development SPD  
Birmingham City Council (2007) Sustainable Management of Urban Rivers and Floodplains SPD  
Birmingham City Council (2008) Sustainable Community Strategy  
Birmingham City Council (2008) Birmingham Private Sector Housing Strategy 2008+ (updated 2010).  
Birmingham City Council (2008) Telecommunications development mobile phone infrastructure SPD  
Birmingham City Council (2008) Contaminated Land Inspection Strategy for Birmingham Second Edition  
Birmingham City Council (2008) Lighting Places Strategy  
Birmingham City Council (2008) Mature suburbs  
Birmingham City Council (2008) Statement of Community Involvement  
Birmingham City Council (2008) Large format banner advertisements SPD  
Birmingham City Council (2010) Birmingham Climate change action plan 2010+  
Birmingham and Black Country Biodiversity Partnership (2010) Birmingham and the Black Country Biodiversity Action Plan  
Birmingham City Council (2011) Places of worship and Faith-Related Community and Educational Uses SPD  
Birmingham City Council (2011) Air Quality Action Plan  
Birmingham City Council (2011) Multi-agency Flood Plan  
Birmingham City Council (2012) Employment Land Review  
Birmingham City Council (2012) Shopping and Local Centres SPD  
Birmingham City Council (2012) Car Parking guidelines SPD  
Birmingham City Council (2012) Car park design guide  
Birmingham City Council (Jan 2012) Level 1 & 2 Strategic Flood Risk Assessment  
Birmingham City Council (2013) Strategic Housing Market Assessment  
Birmingham City Council (2013) Health and Well-being Strategy (Updated Priorities 2017)  
Birmingham City Council (2013) Employment Land and Office Targets  
Birmingham City Council (2013) Green Living Spaces Strategy  
Birmingham City Council (2013) Birmingham Health and Wellbeing Strategy  
Birmingham City Council (2013) Carbon Roadmap  
Birmingham City Council (2014) Gypsy and Traveller Accommodation Assessment  
Birmingham City Council (2014) Birmingham Connected White Paper  
Birmingham City Council (2014) Protecting the Past – Informing the Present. Birmingham's' Heritage Strategy (2014-2019)  
Birmingham City Council (2014) Planning Policy Document, Houses in Multiple Occupation in the Article 4 Direction Area of Selly Oak, Edgbaston & Harborne wards  
Birmingham City Council (2015) Birmingham Surface Water Management Plan  
Birmingham City Council (2015) Corporate Emergency Plan  
Birmingham City Council (2016) Guide to Protected Trees  
Birmingham City Council (2016) A Road Safety Strategy for Birmingham  
Birmingham City Council (2017) Local Flood Risk Management Strategy  
Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022  
Birmingham City Council (2017) Birmingham Cultural Strategy

Birmingham City Council (2017) Birmingham Development Plan  
Birmingham City Council (2018) Council Plan and Budget 2018+  
Birmingham City Council (2018) SHLAA 2017  
Birmingham City Council (2018) Community Cohesion Strategy (Green Paper)  
Birmingham City Council (2018) Air Quality Annual Status Report  
Birmingham City Council (February 2019) Draft Clean Air Strategy  
Birmingham City Council (2019) Public Health Green Paper  
Birmingham City Council (2019) Birmingham Community Cohesion Strategy  
Birmingham City Council (2019) Draft Birmingham Walking and Cycling Strategy and Infrastructure Plan

## 2.2 Environmental, social and economic baseline and evolution without the Plan

- 2.2.1 The SEA Regulations require that information is provided on "... the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan." **Appendix C** contains the updated Scoping Report Baseline.
- 2.2.2 The analysis of the baseline information led to the identification of a number of issues relevant to the Development Management DPD, as set out in **Table 2.2**. These issues are used in combination with the review of plans and programmes and the SA/SEA of the Birmingham Development Plan to inform the development of the Sustainability Objectives and the Assessment Framework as set out in chapter 3.

Table 2.2 Baseline summary and issues relevant to the Development Management DPD

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
Biodiversity and geodiversity	<p>The City has 2 SSSIs and a number of other statutory and non- statutory designated sites which cover approximately 10% of the City. There is one Local Nature Reserve designated in order to protect its geodiversity. The Birmingham and Black Country Nature Improvement Area (NIA) Ecological Strategy provides a landscape-scale framework for action to conserve and enhance biodiversity and geodiversity and to improve ecological networks across the City. The Cannock Chase to Sutton Park Project is another example of landscape-scale action.</p> <p>Biodiversity and Geodiversity is linked to issues related to air quality, water quality, soil quality, health and natural landscape.</p>	<p>Biodiversity and greenspace resources, including locally and nationally important sites, across the City are mapped and managed. Development Management policies will be important in protecting the integrity of biodiversity and geodiversity assets, including designated sites, important habitats and legally protected and notable species both directly and indirectly. For example, continued monitoring of developments on the periphery of designated sites will be important to determine potential indirect and cumulative impacts. Monitoring the potential effects of developments on biodiversity and geodiversity assets more generally is also important because of the potential for these to be influenced by a variety of environmental pathways.</p>	<p>BDP AMR</p> <p>Birmingham and Black Country NIA Ecological Strategy, and BCC and EcoRecord data</p> <p>Birmingham Green Living Spaces Strategy</p> <p>Birmingham and the Black Country Biodiversity Action Plan</p> <p>Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022</p>	<p>In the absence of the DM DPD, there is likely to be less opportunity for the scrutiny of the impacts of specific development in specific locations on biodiversity and geodiversity.</p>
Population and health	<p>Birmingham is the major employment centre for the West Midlands. Birmingham has a high proportion of economically inactive people e.g. students, people caring full-time for relatives. Unemployment is higher than the national average. The economic activity rate for Black and Minority Ethnic residents is far higher than that for white residents.</p>	<p>The population of Birmingham is predicted to grow considerably over the next 20 years and the adopted Birmingham Development Plan is responding to this change through the provision of housing and employment land across the City. The locations of</p>	<p>ONS population estimates</p> <p>BDP</p> <p>Birmingham Health and Wellbeing Strategy</p>	<p>In the absence of the DM DPD, there is likely to be less opportunity for the scrutiny of the impacts of</p>

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
	<p>There is significant disparity in terms of average household income between Birmingham's constituencies. About 40% of Birmingham's residents live in areas that are in the most deprived 10% in England. Concentrations of deprivation are very high in wards to the east, north and west of the City Centre and also in Tyburn and Kingstanding Wards to the north of the M6 motorway. Unemployment rates are above the national average.</p> <p>Economy and equality is linked to issues related to poverty, learning and skills, equality, housing and community involvement.</p> <p>Birmingham faces several issues relating to housing: there are large numbers of homeless people, social housing is in need of updating and relocating, and the number of households is increasing. House prices in Birmingham peaked in January 2008 and sharply declined through to 2010, and now have stabilised. This suggests that the affordability of housing for poorer families and first-time buyers has declined due to other national economic conditions.</p> <p>Housing is linked to issues related to poverty, equality, built and historic environment, natural landscape, sense of place, resource use, energy efficiency and sustainable design, construction and maintenance.</p> <p>The number of residents feeling in poor health is higher than the national average, and people in Birmingham have generally less healthy lifestyles than the English average. Life expectancy in Birmingham is below the England average.</p> <p>Health is linked to issues related to air quality, water quality, biodiversity, natural landscape, culture, sport and recreation, equality and crime.</p> <p>Air quality is an issue as the whole City is designated as an Air Quality Management Area (AQMA); the main source pollutant being nitrogen dioxide as a result of pollution from vehicle emissions. There is a strong correlation between traffic congestion and poor air quality. Given the allocation of an AQMA, and the requirement to maintain an Air Quality Action Plan (AQAP) to direct compliance with national objectives, air quality should improve within the City. In order to deliver compliance, Government has determined the need for Birmingham to introduce a Clean Air Zone (CAZ) to control road transport related emissions particularly Nitrogen Dioxide. A Clean Air Zone feasibility</p>	<p>this development could place greater and different demands on the application of Development Management policies, requiring, for example, that they facilitate development in areas of need and cumulatively do not result in negative effects on specific population groups, areas of the City or key issues such as health through, for example, access to greenspace or reductions in motor transport. Consideration of the wider effects of policy application, such as on health, will also be important through, for example, the control of certain kinds of development in local centres.</p>	<p>Birmingham Air Quality Action Plan</p> <p>Birmingham Air Quality Annual Status Report</p> <p>Birmingham Walking and Cycling Strategy and Infrastructure Plan</p>	<p>specific development in specific locations on the health and well-being of the City's population.</p>

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
	<p>study to determine the type and extent of the zone is underway.</p> <p>Air quality is linked to issues related to biodiversity, health, sustainable transport reducing the need to travel, climate change mitigation and adaptation).</p> <p>Noise pollution is a problem in some parts of the city, with Birmingham airport and traffic being the principal sources. It is anticipated this trend will continue.</p> <p>Noise is linked to issues related to sustainable transport and housing.</p>			
Water resources and quality	<p>New additional water management measures or water resources needed to ensure there is sufficient water for new housing proposed in the Birmingham Plan. New foul drainage infrastructure will also be required to support the proposed level of growth.</p> <p>Resource use is linked to issues related to water quality.</p>	<p>Water resources are under pressure in Birmingham and across the regional generally, with reliance on external sources such as Wales.</p> <p>Development Management policies, in combination with the BDP, should contribute to the protection of water resources and quality through the application of development standards which encourage prudent water resource use and guard against pollution.</p>	<p>Catchment Abstraction Management Strategies (CAMS)</p> <p>Humber River Basin Management Plan</p> <p>Severn Trent Water Resources Management Plan</p> <p>BDP</p>	<p>The BDP contains specific policies on water management measures which development will adhere to.</p>
Climate change	<p>CO<sub>2</sub> emissions and the heat island effect are significant climate related issues which need to be actively managed to avoid their effects becoming more detrimental in the coming decades. Use of the City's Green Infrastructure network will be particularly important in addressing this issue.</p> <p>Reducing carbon emissions and responding to the challenge of climate change is linked to issues related to sustainable transport, reducing the need to travel, air quality, biodiversity health and natural landscape.</p> <p>Recent developments have shown evidence of energy efficiency, but the large number of old properties in the City will need improving to make them more energy efficient, building on current initiatives.</p> <p>Energy efficiency is linked to issues related to renewable energy, sustainable design construction and maintenance, housing and social and environmental responsibility.</p> <p>Although the City has good public transport infrastructure, it needs expanding and upgrading to help minimise the high level of car use in Birmingham. Emphasis will be placed on 'smarter travel', discouraging</p>	<p>Climate change impacts for Birmingham are likely to consist of higher temperatures and more extreme events, including rainfall leading to flooding.</p> <p>Whilst it is challenging for Development Management policies to be specific on climate change adaptation measures, the design of buildings for example will be important, as will the continued encouragement of CO<sub>2</sub> reductions through energy efficiency measures and encouraging pedestrian, cycling and public transport access wherever possible.</p>	<p>UKCP09 predictions</p> <p>Birmingham Climate Change Action Plan 2010, Carbon Roadmap 2013</p> <p>BDP</p> <p>Birmingham Air Quality Action Plan</p> <p>Birmingham Carbon Roadmap</p> <p>Birmingham Walking and Cycling Strategy and Infrastructure Plan</p>	<p>The BDP contains policies (TP1 – TP4) relating to climate change, although the DM DPD allows for the scrutiny of the impacts of specific development on climate change.</p>

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
	<p>unnecessary journeys and encouraging people to use public transport. Congestion is a significant issue at certain times on both road and rail.</p> <p>Sustainable transport is linked to issues related to air quality, reducing the need to travel, health, climate change mitigation and adaptation.</p> <p>A very small proportion of people who work and live in the city (one tenth) work from home and therefore avoid travelling to work. There is little evidence of people being actively encouraged to work from home. More emphasis needs to be placed on 'smarter travel', discouraging unnecessary journeys, encouraging people to use public transport, and the provision of new/enhanced footways and cycleways.</p> <p>Reducing the need to travel is linked to issues related to sustainable transport, air quality, health, climate change mitigation and adaptation and noise.</p>			
Flood risk, incidences of flooding and flood defences	<p>Birmingham City Council has a good record of taking on board Environment Agency comments in terms of permitting development in flood risk areas. It is recognised by the City Council that measures will need to be put in place to manage and where possible reduce flood risk. Use of the City's Green Infrastructure network will be particularly important in addressing this issue.</p> <p>Managing and reducing flood risk is linked to issues related to health and well-being, biodiversity and infrastructure provision.</p>	Sources of flood risk are from river flooding, surface water flooding, sewer flooding and groundwater flooding. There are around 9,000 properties at risk from fluvial flooding and 30,000 from surface water flooding (1 in 100 year event). These risks will be taken into account as part of the assessment of applications for development.	<p>Birmingham Strategic Flood Risk Assessment</p> <p>BCC records</p> <p>Birmingham Local Flood Risk Management Strategy</p> <p>Birmingham Multi-agency Flood Plan</p> <p>Birmingham Surface Water Management Plan</p>	The BDP contains specific policies on water management measures which development will adhere to.
Material assets (housing, economy, key infrastructure, minerals and waste)	<p>Good use is being made of previously developed land as a very high proportion of new housing and office development has taken place on previously developed land. Multifunctional use of land is also important with the City's Green and Blue Infrastructure network having an important role to play in achieving this.</p> <p>Efficient use of land is linked to issues related to soil quality, flood risk, water quality, natural landscape, built and historic environment, biodiversity culture, sport and recreation and sense of place. Use of renewable energy could be significantly improved.</p>	Development Management policies, in combination with those of the BDP, will be influential in promoting the efficient use of material assets through, for example, attention on energy efficiency standards, the use of recycled aggregates and promotion of waste management. The effects are likely to be cumulative and long term in character, associated with the progressive replacement of the City's	<p>ONS data</p> <p>BDP</p> <p>Green Living Spaces Strategy</p> <p>Municipal Waste Management Strategy</p>	In the absence of the DM DPD, there will be less opportunity to monitor and evaluate the specific effects on material assets of developments, and in turn promote more sustainable

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
	<p>Renewable energy is linked to issues related to climate change mitigation and adaptation.</p> <p>Landfill diversion rates are increasing in the City, and past targets for recycling have been met.</p> <p>The percentage of waste sent to landfill within the City has decline to one third of its level ten years ago, whilst recycling has trebled. Given European and national targets, it is likely these trends will continue.</p> <p>Waste reduction and minimisation is linked to issues related to air quality, soil quality, natural landscape and built and historic environment.</p>	<p>housing stock through renewal and new build.</p> <p>There is high demand for housing in Birmingham and not all of it can be met within Birmingham itself and demand for housing is likely to continue to increase with forecast population growth.</p>		<p>management of these.</p>
Cultural heritage	<p>Birmingham has a large amount of land designated as Conservation Areas, some of which are nationally recognised such as the Jewellery Quarter and Bourneville. The City also has an extensive number of archaeological remains Listed Buildings and Registered Parks &amp; Gardens.</p> <p>Built and historic environment is linked to issues related to sense of place, housing, sustainable design, construction and maintenance, crime and poverty.</p>	<p>Cultural heritage is a diverse, City-wide asset which can be vulnerable to the effects of development, both direct and indirect, short-term and cumulative. Criteria guiding Development Management policies will help to avoid immediate impacts, but monitoring will be required to ensure that there are no unintended consequences for example in relation to the wider setting of cultural heritage assets which can be affected by cumulative development.</p>	<p>BDP Birmingham Regeneration through Conservation SPG Birmingham Archaeology Strategy SPG Protecting the Past – Informing the Present. Birmingham’s Heritage Strategy (2014-2019)</p>	<p>In the absence of the DM DPD, there will be less opportunity to monitor and evaluate the specific effects of development on cultural heritage.</p>
Landscape and townscape	<p>Although much of Birmingham is built up, there is a significant amount of open land within the City including areas of agricultural land to the north east and south west of the City. The City falls within the National Character Areas (NCAs) of Arden to the south and Cannock Chase and Cank Wood to the north. The assessment of these areas for the Countryside Quality Counts project for Natural England indicates that they are subject to a high rate of change. Most of Birmingham is built up, but 15% of the City is designated as Green Belt.</p> <p>Natural landscape is linked to issues related to biodiversity, health, soil quality, sense of place, culture, sport and recreation, climate change mitigation and adaptation, managing and reducing flood risk.</p>	<p>Although much of Birmingham is built up, there is a significant amount of open land within the City. Landscape character is a key contributor to regional and local identity, influencing sense of place, shaping the settings of people’s lives and providing a critical stimulus to their engagement with the natural environment. The Development Management DPD, in combination with the BDP, will be influential in helping to retain a sense of character across the City in the context of development pressures.</p>	<p>BDP Birmingham Green Living Spaces Strategy Birmingham Health and Wellbeing Strategy</p>	<p>Whilst the BDP (policy PG3) addresses place-making, in the absence of the DM DPD there will be less opportunity to scrutinise specific matters relating to landscape and trees.</p>



## 3. Methodology

### 3.1 The SA Framework

- 3.1.1 The SA Framework comprises of 15 objectives and associated guide questions. Broadly, the SA objectives present the preferred environmental, social or economic outcome which typically involves minimising detrimental effects and enhancing positive effects. They have been developed to enable a comprehensive assessment of the likely significant effects of the implementation of the Development Management DPD by covering key environmental, social and economic issues.
- 3.1.2 The development of the SA objectives has been informed by the review of plans and programmes, the analysis of the baseline evidence the consideration of the key sustainability issues for Birmingham (presented in **Table 2.2**) and the SA Objectives developed for the BDP. In addition, they also reflect comments received during the Regulation 18 consultation of the SA Scoping Report (summarised in **Appendices D and E**), the Issues & Options Consultation (**Appendix F**) and the Preferred Options Consultation (**Appendix G**).
- 3.1.3 **Table 3.1** sets out the SA Framework for assessing the sustainability performance of the Development Management DPD, specifically evaluating whether there are likely to be any significant effects associated with implementation of the DPD.

Table 3.1 Sustainability Objectives, Guide Questions and Indicators

SEA Directive Topic Area(s)	Sustainability Objectives	Guide Questions	Potential Indicators
Material assets	ENV1 To encourage development that optimises the use of previously developed land and buildings	Will the use of previously developed land be encouraged? Will development densities be maximised?	Proportion of new development on previously developed land Development densities achieved
Material assets	ENV2 To promote the application of high standards of design, construction and maintenance of buildings	Will development be encouraged to meet and where possible exceed standards for energy efficiency?	Proportion of developments meeting energy efficiency standards for design, construction and maintenance
Material assets	ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	Will development be encouraged to incorporate measures which promote sustainable transport? Will development help to reduce the need to travel?	Work place travel plans Measures to promote sustainable transport such as provision for cyclists
Landscape, cultural heritage, biodiversity, flora and fauna	ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	Will development protect and where possible enhance the City's cultural and natural heritage?	Development affecting historic assets Development affecting natural assets including open space
Climatic factors	ENV5 To promote development which anticipates and responds to the challenges associated with	Will development help to reduce flood risk?	Renewable energy installed

SEA Directive Topic Area(s)	Sustainability Objectives	Guide Questions	Potential Indicators
	climate change, particularly managing and reducing flood risk	Will development take into account and actively mitigate climate change impacts?	Other measures installed such as SUDS Flooding events Approvals made contrary to EA advice
Water, air, material assets	ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	Will development incorporate water efficiency measures? Will development actively avoid creating additional pollution burdens?	Water use and technologies Changes in water quality Change to/within Air Quality Management Areas Noise complaints Sustainable waste management
Population and human health	ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	Will development promote growth in key economic sectors? Will development contribute to encouraging a culture of enterprise and innovation?	Employment creation by area and type Business start-ups
Population and human health	ECON2 To help promote the vitality of local centres	Will development contribute to the maintenance and enhancement of the vitality of local centres?	Local centre health checks
Population and human health	ECON3 To promote the regeneration of areas across the City through appropriate development	Will development contribute to regeneration of areas of the City most in need?	Location and type of development
Population and human health	ECON4 To encourage investment in learning and skills development	Will development contribute to investment in learning and skills?	Local initiatives to promote skills development
Population and human health	SOC1 To help ensure equitable access to community services and facilities	Will development help to promote equitable access to services?	Accessibility indices of key facilities
Population and human health	SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	Will development help to promote access to a range of housing types which meet the needs of residents?	Development types and spatial distribution
Population and human health	SOC3 To encourage development which promotes health and well-being	Will development help to promote a healthier, more active population?	Activity levels by area and sector of the population
Population and human health	SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	Will development help to discourage crime?	Crime levels by area and type
Population and human health	SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	Will public participation be encouraged as part of the planning of new development?	Participation in consultations

## 3.2 Appraisal Methodology

3.2.1 Based on the contents of the Development Management DPD detailed in Section 1.4, the SA Framework has been used to appraise the DPD Objectives and Development Management policies. The approach to the appraisal of each of the elements listed above is set out in the sections that follow.

### DPD Objectives

3.2.2 It is important that the Objectives of the DPD (which are those of the BDP) are aligned with the SA objectives. The Objectives contained in the DPD (see **Section 1.4**) have therefore been appraised for their compatibility with the objectives that comprise the SA Framework to help establish whether the proposed general approach to the DPD is in accordance with the principles of sustainability. A compatibility matrix has been used to record the appraisal, as shown in **Table 3.2** below.

Table 3.2 Compatibility matrix

SA Objective	DPD Objective			
	Objective 1	Objective 2	Objective 3	Objective 4
ENV1 To encourage development that optimises the use of previously developed land and buildings	0	0	+	?
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	-	+	+
Etc...	+	0	+	?

### Key

+	Objectives are potentially compatible	?	Uncertain if Objectives are related	~	No clear relationship between Objectives	-	Objectives are potentially incompatible
---	---------------------------------------	---	-------------------------------------	---	--	---	---

### DPD Policies

3.2.3 The proposed Development Management policies have been appraised against each of the SA objectives that comprise the SA Framework using an appraisal matrix. The matrix includes:

- The SA objectives;
- A score indicating the nature of the effect for each option on each SA objective;
- A commentary on significant effects (including consideration of the cumulative, synergistic and indirect effects as well as the geography, duration, temporary/permanence and likelihood of any effects) and on any assumptions or uncertainties; and
- Recommendations, including any mitigation or enhancements measures.

3.2.4 The format of the matrix that has been used in the appraisal is shown in **Table 3.3**. A qualitative scoring system has been adopted which is set out in **Table 3.4**. The proposed policies contained in the DPD have been appraised against the SA objectives with a score awarded both for each

constituent policy and for the cumulative effect of each policy. The policy appraisal matrices are presented at **Appendix A**, including reasonable alternatives, where appropriate. Reasonable alternatives comprise combinations of: no policy, retention of the existing UDP Policy or a policy with differing content. In the majority of instances, however, there are no reasonable alternatives as a policy is required by National Policy in order to interpret the intention and requirements of the NPPF at the local level. In each case, reasons for the proposed policy are given.

Table 3.3 Appraisal matrix

SA Objective	Score	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	-	<p><b>Likely Significant Effects</b></p> <p>A description of the likely significant effects of the preferred option on the SA objective has been provided here, drawing on baseline information as appropriate.</p> <p><b>Mitigation</b></p> <ul style="list-style-type: none"> <li>Mitigation and enhancement measures are outlined here.</li> </ul> <p><b>Assumptions</b></p> <ul style="list-style-type: none"> <li>Any assumptions made in undertaking the appraisal are listed here.</li> </ul> <p><b>Uncertainties</b></p> <ul style="list-style-type: none"> <li>Any uncertainties encountered during the appraisal are listed here.</li> </ul>
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	<p><b>Likely Significant Effects</b></p> <p>A description of the likely significant effects of the preferred option on the SA objective has been provided here, drawing on baseline information as appropriate.</p> <p><b>Mitigation</b></p> <ul style="list-style-type: none"> <li>Mitigation and enhancement measures are outlined here.</li> </ul> <p><b>Assumptions</b></p> <ul style="list-style-type: none"> <li>Any assumptions made in undertaking the appraisal are listed here.</li> </ul> <p><b>Uncertainties</b></p> <p>Any uncertainties encountered during the appraisal are listed here.</p>
Etc.		

Table 3.4 Appraisal Scoring system

Score	Description	Symbol
Significant Positive Effect	The proposed option/policy contributes significantly to the achievement of the objective.	++
Minor Positive Effect	The proposed option/policy contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed option/policy does not have any effect on the achievement of the objective	0
Minor Negative Effect	The proposed option/policy detracts from the achievement of the objective but not significantly.	-
Significant Negative Effect	The proposed option/policy detracts significantly from the achievement of the objective.	--
No Relationship	There is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.	~

Score	Description	Symbol
Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.	?

NB: where more than one symbol/colour is presented in a box it indicates that the appraisal has identified both positive and negative effects. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.

### 3.3 Geographical and temporal scope

3.3.1 The geographical scope of the SA principally relates to administrative area of the City of Birmingham, but also takes into account sub-regional, regional and national impacts where appropriate. Birmingham’s position as the principal settlement of the West Midlands means that it’s environmental, social and economic role and impact reach far beyond its immediate boundaries, with attendant implications for key sustainability issues such as carbon emissions, housing provision and wealth creation. The assessment considers sustainability issues and effects in relation to the short term (1-5 years), medium term (5-10 years) and longer term, (10-20 years), the latter being the intended lifespan of the Development Management DPD (to 2031).

### 3.4 Mitigation

3.4.1 Identifying effective mitigation measures will also be an important part of the Environmental Report. **Box 3.1** provides information on types and examples of mitigation measures that might be proposed and includes an overview of the mitigation hierarchy. The mitigation hierarchy is based on the principle that it is preferable to prevent the generation of an impact rather than counteract its effects. It thus suggests that mitigation measures higher up the hierarchy should be considered in preference to those further down the list.

Box 3.1	Mitigation Hierarchy and Example Measures
<p><u>Mitigation measures should be consistent with the mitigation hierarchy (after DETR 1997<sup>19</sup> and CLG 2006<sup>20</sup>):</u></p> <ul style="list-style-type: none"> <li>• Avoidance - making changes to a design (or potential location) to avoid adverse effects on an environmental feature. This is considered to be the most acceptable form of mitigation.</li> <li>• Reduction - where avoidance is not possible, adverse effects can be reduced through sensitive environmental treatments/design.</li> <li>• Compensation - where avoidance or reduction measures are not available, it may be appropriate to provide compensatory measures (e.g. an area of habitat that is unavoidably damaged may be compensated for by recreating similar habitat elsewhere). It should be noted that compensatory measures do not eliminate the original adverse effect, they merely seek to offset it with a comparable positive one.</li> <li>• Remediation - where adverse effects are unavoidable, management measures can be introduced to limit their influence.</li> <li>• Enhancement - where there are no negative impacts, but measures are adopted to achieve a positive move towards the sustainability objectives e.g. through innovative design.</li> </ul> <p><u>Examples of how mitigation measures could be incorporated into DM DPD proposals could include:</u></p> <ul style="list-style-type: none"> <li>• Ensuring that development management decisions are scrutinised for consistency, cumulative impacts and potential unintended consequences at site, neighbourhood and City-wide levels.</li> <li>• Monitoring the scope the DM DPD and its relationship with the BDP, and where there could be policy gaps.</li> </ul>	

<sup>19</sup> Department of the Environment, Transport and the Regions (1997) *Mitigation Measures in Environmental Statements*. London: DETR

<sup>20</sup> Department for Communities and Local Government (2006): *Consultation Document - EIA: A guide to good practice and procedures*. London: CLG



**Box 3.1 Mitigation Hierarchy and Example Measures**

- Monitoring the impacts of particular policies and their effectiveness, particularly in respect of the criteria used to help define the policy.

### 3.5 Who carried out the appraisal

3.5.1 The SA has been undertaken by Wood on behalf of Birmingham City Council.

### 3.6 Difficulties encountered

3.6.1 The SEA Directive requires the identification of any difficulties (such as technical deficiencies or lack of knowledge) encountered during the appraisal process. These uncertainties and assumptions are detailed in the appraisal matrices. Those uncertainties and assumptions common across the appraisal are outlined below.

#### Uncertainties

- The case-by-case character of individual development proposals which although of a similar type could yield different sustainability outcomes depending on their location.
- The cumulative sustainability impacts of developments in a particular area.
- The trade-offs which might be required between environmental, social and economic sustainability outcomes in light of the specific character of developments.
- Notwithstanding monitoring of various indicators (as part of the BDP as a whole), the difficulty of precisely measuring the sustainability impacts (positive and negative) of specific developments in particular localities and over time.

#### Assumptions

- That all development proposals will be consistently judged against the policy requirements of the DM DPD and the BDP more widely, including wider statutory measures relating, for example, to energy efficiency in buildings and air pollution.
- That monitoring of the environmental, social and economic impacts of development will enable judgements to be made on the overall sustainability of development in the City, and in turn feed back into policy evolution.
- That policy will be implemented consistently across the City and the results of DM decisions monitored accordingly.

## 4. Appraisal of the Publication Development Management DPD and Reasonable Alternatives

### 4.1 Compatibility between the DPD Objectives and the SA Objectives

4.1.1 A matrix has been completed to assess the compatibility of the objectives contained in the Publication Draft Development Management DPD against the SA objectives. It helps to identify at an early stage where there could be conflict between the two sets of objectives, particularly in respect of economic and social objectives which can sometimes be at odds with environmental objectives.

4.1.2 The following Objectives (repeating those of the BDP) have been set for the emerging Development Management DPD:

1. To develop Birmingham as a City of sustainable neighbourhoods that are safe, diverse and inclusive with locally distinctive character.
2. To make provision for a significant increase in the City's population.
3. To create a prosperous, successful and enterprising economy with benefits felt by all.
4. To promote Birmingham's national and international role.
5. To provide high quality connections throughout the City and with other places including encouraging the increased use of public transport, walking and cycling.
6. To create a more sustainable City that minimises its carbon footprint and waste, and promotes brownfield regeneration while allowing the City to grow.
7. To strengthen Birmingham's quality institutions and role as a learning City and extend the education infrastructure securing significant school places.
8. To encourage better health and well-being through the provision of new and existing recreation, sport and leisure facilities linked to good quality public open space.
9. To protect and enhance the City's heritage assets and historic environment.
10. To conserve and enhance Birmingham's natural environments, allowing biodiversity and wildlife to flourish.
11. To ensure that the City has the infrastructure in place to support its future growth and prosperity.

4.1.3 **Table 4.1** presents an assessment of the compatibility between these Objectives and the SA Objectives.

Table 4.1 Compatibility between the Development Management DPD Objectives and the SA Objectives

Sustainability Objectives	Plan Objectives										
	1. Sustainable Neighbourhoods	2. Population Growth	3. Prosperity	4. National & International Role	5. Connectivity	6. Sustainable City	7. Education	8. Health & Well-being	9. Heritage	10. Natural Environment	11. Infrastructure
ENV1 To encourage development that optimises the use of previously developed land and buildings	+	+	?	?	~	+	~	+	~	?	~
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	~	~	+	~	+	~	~	+	~	~
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+	~	+	?	+	+	~	+	~	~	+
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage, including resilient ecological networks able to meet the demands of current and future pressures	+	?	~	+	+	+	+	+	+	+	
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing flood risk	+	?	?	~	~	+	~	+	?	?	?
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	+	?	?	~	~	+	~	+	~	+	~
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	+	+	+	~	+	+	+	?	?	~
ECON2 To help promote the vitality of local centres	+		+	~	~	+	~	~	~	~	~
ECON3 To promote the regeneration of areas across the City through appropriate development	+	+	+	~	+	+	~	+	~	~	+
ECON4 To encourage investment in learning and skills development	~	~	+	~	~	~	+	~	~	~	~
SOC1 To help ensure equitable access to community services and facilities	+	~	+	~	+	+	+	+	~	~	+
SOC2 To help provide decent and affordable housing for all, of the right	+	+	~	~	~	~	~	+	~	~	~

Sustainability Objectives	Plan Objectives										
	1. Sustainable Neighbourhoods	2. Population Growth	3. Prosperity	4. National & International Role	5. Connectivity	6. Sustainable City	7. Education	8. Health & Well-being	9. Heritage	10. Natural Environment	11. Infrastructure
quantity type, tenure and affordability to meet local needs											
SOC3 To encourage development which promotes health and well-being	+	~	~	~	+	+	~	+	~	+	~
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	+	~	~	~	~	~	~	+	~	~	~
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+	~	~	~	~	~	~	+	~	~	~
<b>+</b>	Objectives are potentially compatible	<b>?</b>	Uncertain if Objectives are related	<b>~</b>	No clear relationship between Objectives	<b>-</b>	Objectives are potentially incompatible				

4.1.4 The compatibility analysis in **Table 4.1** reveals that the great majority of SA Objectives and Plan Objectives are either compatible or have no direct relationship with one another. No potential incompatibilities between objectives have been identified, although there are a number of uncertain relationships relating to:

- ▶ Plan Objective 2 (population growth);
- ▶ Plan Objective 3 (prosperity);
- ▶ Plan Objective 4 (national and international role);
- ▶ Plan Objective 9 (heritage);
- ▶ Plan Objective 10 (natural environment); and
- ▶ Plan Objective 11 (infrastructure).

4.1.5 The potential uncertainties principally relate to dilemmas in reconciling the need and demand for development with environmental protection (ENV1, 3, 4, 5 and 6 and ECON 1). In many instances, any potential conflicts arising will have to be determined on a case-by-case basis given the particular character and context of development. These uncertainties are not regarded as barriers to development although particular attention will have to be paid to the application of policy in light of these relationships. These are highlighted as issues which could require monitoring.

## 4.2 Policies and alternatives

4.2.1 The Development Management DPD proposes 16 policies to manage various aspects of development across the City. The policies have emerged through a process of consultation within

Birmingham City Council and with interested parties. In reaching the proposed policies, options have been considered in most cases. This took account of the following factors:

- the extent to which the policy is required in light of the City Council's corporate objectives and national planning policy;
- the extent to which there is a reasonable need to update the existing policy (which is the most common instance);
- the extent to which a potential alternative approach would ensure efficient and effective management of development to meet local needs and priorities to address the specific issues identified;
- the extent to which a potential alternative could be pursued without placing an unreasonable burden on applicants or the decision making process (such as through requirements for supporting information).

4.2.2 In consequence, alternatives that have been considered have included:

- having no policy;
- reliance on national policy (i.e. the NPPF);
- using the existing UDP policy;
- variations on the proposed policy.

4.2.3 The development of such alternatives have been considered on a case by case basis, to ensure only those that are reasonable, realistic and achievable are subject to appraisal. In comes instances when considering individual policies, no reasonable alternatives have been identified.

### 4.3 Summary of results and the reasons for selecting/rejecting the alternatives

4.3.1 **Table 4.2** summarises the results of the appraisal of policies, drawn from the analysis in **Appendix A** which appraises the proposed policies against reasonable alternatives.

Table 4.2 Summary of the results of the appraisal of the preferred policy option

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
<b>Environment and Sustainability</b>		
DM1 Air Quality	A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. The policy could benefit from the inclusion of examples of measures against	<b>No alternative</b> has been identified to this policy - National policy requires planning to contribute towards compliance with relevant limit values or national objectives for pollutants and take into account local AQMA and Clean Air Zones (CAZ). Therefore in order to comply with national policy it is considered necessary to set policy aimed at improving air quality and mitigating the impacts of development on air quality. Having no air quality policy will risk undermining the AQMA and CAZ and failure to deliver relevant actions within the City's Air Quality Action Plan, transport strategy and the objectives

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
	which the policy will be implemented and measured.	of the BDP in promoting sustainable development, and helping to address climate change.
DM2 Amenity	<p>Good design is important to securing sustainable development through balancing a wide variety of considerations. The detailed criteria within DM01 against which developments will be considered serve as a reference point against which specific proposals can be considered, thereby helping to ensure that development takes account of the specific matters which help to make the City and its neighbourhoods attractive and successful places to live. The specific requirements of DM02 complement the overarching principles set out in DM01. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing a new policy to address design issues yields more positive sustainability outcomes than the reasonable alternatives presented.</p>	<p><b>No policy</b> on amenity and rely instead on the NPPF and ad hoc considerations of proposals on a case by case basis.</p> <p>Reason for rejection: The Council believes the preferred approach will provide a more transparent, consistent and fairer basis for considering planning proposals than having no policy. To ensure the successful delivery of the BDP, amenity considerations are considered important. The NPPF is clear that planning should seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.</p>
DM3 Land affected by Contamination, Instability and Hazardous Substances	<p>A policy which clearly addresses environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal.</p>	<p><b>No alternative</b> to this policy has been identified - Environmental health legislation requires local authorities to identify contaminated land and ensure it is managed in an appropriate manner. The NPPF also stresses the need for policies to ensure that new development is compatible with its location. The NPPF makes clear that developers and landowners are responsible for securing safe development where a site is affected by contamination.</p>
DM4 Landscaping and Trees	<p>Trees and landscaping are fundamental to a high quality and ultimately sustainable environment, contributing aesthetically and functionally to the quality of life across the City. Specification of expectations for design and use of trees and landscaping as part of new development will ensure that, in combination with other policies, high quality design is realised and wider sustainability enhancements are secured. There are no suggested changes to the content of the policy arising from the appraisal, other than cross-referencing Council Strategies relating to Green Infrastructure, for example.</p>	<p><b>No alternative</b> to this policy has been identified - The NPPF and BDP provide strong support for protecting and enhancing valued landscapes. Local planning authorities are advised to set criteria based policies against which proposals for any development on or affecting protected wildlife or landscape areas will be judged.</p>
DM5 Light Pollution	<p>A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum</p>	<p><b>No alternative</b> to this policy has been identified - The NPPF is clear that planning policy should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. The draft policy provides a detailed approach for achieving this.</p>

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
	standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal.	
DM6 Noise and Vibration	A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal.	<b>No alternative</b> has been identified to this policy - National planning policy requires development to contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. In addition, the BDP seeks to create well designed, healthy and safe environments. It is therefore considered necessary to include this policy.
<b>Economy and Network of Centres</b>		
DM7 Advertisements	A specific policy which clearly controls the siting and design of advertisements will provide an important reference point for ensuring that a range of sustainability benefits are secured, focused on enhancing economic development in the City whilst ensuring that residential amenity and City-wide amenity is protected. In all cases, the greater certainty and precision associated with an updated policy is likely to yield positive sustainability effects. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	<b>No policy</b> on advertisements Reasons for rejection: Not having a policy and relying upon applications being considered against the National Planning Policy Framework would not be favoured since there would be no safeguard against inappropriate advertisements and signs.
DM8 Places of Worship and other faith related community facilities	Ensuring the appropriate location and design of these uses will help to ensure that sustainable development is promoted, particularly having regard to equitable access through public transport and sensitive design ensuring that impacts on local amenity are minimised. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	<b>Retain the wording of existing policy</b> in paragraphs 8.31 - 8.35 of the Saved Unitary Development Plan 2005 and Places for Worship and Faith-related Community and Educational Facilities SPD (2011) Reasons for rejection: This policy needs to be updated to reflect Policy TP21 of the BDP which states that the preferred location for community facilities (e.g. health centres, education and social services and religious buildings) is within the network of defined centres. <b>No policy</b> on places of worship and faith related community uses. Reasons for rejection: Birmingham has a diverse mix of faiths and cultures. A policy is required to ensure that development for places of worship and faith related

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
		community uses takes place in the appropriate locations and their impacts on the local area are managed.
DM9 Day nurseries and early years provision	A policy which ensures the consistent provision of educational facilities of various kinds across the City will help to ensure that there is equitable access (for example through sustainable locations) and in a fashion which maintains and enhances local amenity. The precise effects of the policy will have to be monitored to determine whether the policy objectives are being realised in practice. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address education-related development issues yields more positive sustainability outcomes than the reasonable alternatives presented.	<p><b>Retain existing UDP policy</b></p> <p>Reasons for rejection: The policy requires updating as it refers to out of date policies. The existing policy does not reflect the Policy TP21 in the BDP which states that the preferred location for community facilities (e.g. health centres, education and social services and religious buildings) is within the network of defined centres.</p> <p><b>No policy</b> on day nurseries and child care provision</p> <p>Reasons for rejection: Without a policy on the development of day nurseries and childcare provision, development may result in adverse impacts on the vitality of local centres, residential amenity and character of an area.</p>
<b>Homes and Neighbourhoods</b>		
DM10 Standards for Residential Development	This policy will yield a range of sustainability benefits, associated with ensuring that there is high quality residential development throughout the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing new policy to address residential design matters yields more positive sustainability outcomes than the reasonable alternatives presented.	<p><b>Retain existing UDP policy</b> in paragraph 8.39-8.44 of the Saved Unitary Development Plan regarding house extensions. There is no existing policy on housing technical standards for internal space, outdoor amenity space or accessible and adaptable housing.</p> <p>Reasons for rejection: The policy requires updating to achieve good standards of amenity for the occupiers of new residential buildings and protect the amenity of nearby occupiers and residents. The general thrust of the existing policy regarding residential extensions is taken forward into the new policy.</p> <p><b>No minimum space standards or policy</b> on separation distances, outdoor amenity space and accessible and adaptable housing.</p> <p>Reasons for rejection: Having no such policy would risk developments not achieving a reasonable level of amenity therefore impacting on quality of life. Minimum space standards will help to ensure that there is sufficient space, privacy and storage facilities to ensure the long-term sustainability and usability of homes. DM9 is consistent with the NPPF requires local planning authorities to seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.</p>
DM11 Houses in Multiple Occupation (HMO)	The sustainability effects of a clear policy which seeks to control Houses in Multiple Occupation (HMO) is likely be positive, reflecting the potential issues associated with them. The sustainability effects relate to ensuring that local amenity and design quality is appropriately protected, whilst providing for the needs of those in need. No likely significant negative effects have been identified. There are no suggested changes to	<p><b>Retain existing UDP policy</b></p> <p>Reasons for rejection: This policy requires updating as it refers to out of date UDP policies, but the main thrust of the policy remains unchanged in DM11.</p> <p><b>No policy</b> on HMO</p> <p>Reasons for rejection: Without a HMO policy, development could result in concentrations of HMOs which can lead to a number of negative impacts on local communities, for example more frequent noise nuisance,</p>

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
	the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	depopulation of neighbourhoods during academic vacations, and increased pressure on parking due to higher population densities. <b>Less prescriptive policy</b> Reasons for rejection: Defining cumulative impact by using a threshold against which applications will be assessed will aid in transparency and consistency in decision-making.
DM12 Residential conversions and specialist accommodation	Promoting sensitive residential conversions and the development of appropriate specialist accommodation is likely to result in significant positive effects through the provision of appropriate accommodation for those in particular need. The option of having no specific policy could result in some minor adverse effects relating to social indicators.	<b>No policy</b> on Residential Conversions Reasons for rejection: Without a policy on residential conversions and specialist accommodation there are likely to be a range of negative effects relating to poor quality living environments and negatives impacts on local amenity arising from over-concentrations of such uses.
DM13 Self and Custom-build Housing	Promoting self- and custom-build housing through a specific policy is likely to yield positive sustainability effects City-wide with no adverse effects identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of having no specific policy could result in some minor adverse effects relating to social indicators.	<b>No policy</b> on self and custom build housing. Reasons for rejection: The Council wishes to take a proactive approach to supporting individuals or groups of individuals that wish to build their own homes as a more affordable means by which to access home ownership. It is also a duty upon local authorities to have regard to the Self and Custom Build Register in carrying out their planning, housing, land disposal and regeneration functions.
<b>Connectivity</b>		
DM14 Highway Safety and Access	Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect on enhancing the City's economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is enhanced though the greater opportunities for efficient travel within the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal.	<b>No alternative</b> to this policy has been identified - the NPPF requires development to provide for safe and suitable access to the site for all users. It states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
DM15 Parking and Servicing	Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect on enhancing the City's economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is enhanced though the greater opportunities for efficient travel within the City. No likely	<b>No policy</b> Reasons for rejection: National policy makes clear that parking standards should be determined at the local level in response to local circumstances. The proposed policy supports the implementation of the BDP in developing a sustainable, high quality, integrated transport system. It is considered essential that appropriate parking is provided to contribute to traffic

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
	significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	reduction and ensure safety, inclusive development and manage any impact on amenity.
DM16 Telecommunications	Ensuring that the City has an up-to-date telecommunications infrastructure will ensure sustainability benefits across a range of objectives, notably the contribution to the City's economic performance, creating opportunities for travel reduction and ensuring that all residents have equitable access to high quality services that enable them to fulfil their economic and social potential. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address telecommunications siting matters yields more positive sustainability outcomes than the reasonable alternatives presented.	<b>No policy</b> Reasons for rejection: policy supports the implementation of the Policy TP46 Digital Communications of the BDP. The Council supports well-designed and located high quality communications infrastructure and this policy is intended to facilitate provision in line with this aspiration.

- 4.3.2 **Table 4.3** summarises the scores, by SA Objective, attributed to the preferred policy option and then provides an overall assessment of the cumulative effects of the 15 preferred policies against each SA Objective.
- 4.3.3 The results set out in Tables 4.2 and 4.3 demonstrate the overwhelming likely positive or significantly positive effects resulting from implementation of the policies. This reflects their positive intent and the need to deal systematically and objectively with planning issues arising day-to-day across the City, as well as the experience accumulated through implementation of previous Development Management policies through the UDP. More generally, the Development Management policies represent the lowest tier in a hierarchy of planning policies, adding local detail to implement the broader principles of policies within the NPPF and the Birmingham Development Plan. As such they specifically address local issues and are designed to mitigate potential adverse effects associated with development.
- 4.3.4 No significant negative effects, either associated with specific sustainability objectives or cumulatively have been identified. This contrasts with the scores attributed to the absence of a policy which are typically significantly negative (see **Appendix A**), reflecting the clear need to systematically control development and the likely consequences of the absence of such a local policy framework whose presence is to the benefit of applicants, residents and the City as a whole.
- 4.3.5 Some policies have been identified as holding some uncertainty as to their precise effects in respect of meeting sustainability objectives. These apply principally to whether significant positive effects are likely to be fully realised in respect of matters such as sustainable travel and construction, or enhanced access by local communities to skills enhancement from the construction of education facilities, reflecting the case-by-case nature of individual developments and their particular circumstances. Nevertheless, the potential for the realisation of significant positive or positive effects exists.

Table 4.3 Summary of scores attributed to the Publication Plan Policies

	ENV1 optimise use of previously developed land	ENV2 apply high standards of design, construction and maintenance	ENV3 encourage sustainable methods of transport and reduce the need to travel	ENV4 protect and enhance Birmingham's cultural and natural heritage	ENV5 anticipate and respond to the challenges associated with climate change, particularly managing and reducing flood risk	ENV6 make best use of water resources, reduce pollution and encourage sustainable waste management	ECON1 improve the performance of the local and City-wide economy to provide opportunity for all	ECON2 promote the vitality of local centres	ECON3 promote the regeneration of areas across the City	ECON4 encourage investment in learning and skills development	SOC1 ensure equitable access to community services and facilities	SOC2 provide decent and affordable housing for all meet local needs	SOC3 promotes health and well-being	SOC4 reduce crime, the fear of crime and antisocial behaviour	SOC5 enable communities to influence the decisions that affect their neighbourhoods and quality of life
DM1 Air Quality	~	++?	+	~	~	++?	+	~	+	~	~	~	++	~	~
DM2 Amenity	~	++	~	++	~	~	++	++	++	~	~	~	++	~	~
DM3 Land affected by contamination, instability and hazardous substances	++	~	~	~	~	++?	+	~	+	~	~	~	++	~	~
DM4 Landscaping and trees	~	++	~	++	++	++	++	++	++	~	~	~	++	++	~
DM5 Light Pollution	~	+	~	++	~	~	~	+	~	~	~	~	~	+	~

	ENV1 optimise use of previously developed land	ENV2 apply high standards of design, construction and maintenance	ENV3 encourage sustainable methods of transport and reduce the need to travel	ENV4 protect and enhance Birmingham's cultural and natural heritage	ENV5 anticipate and respond to the challenges associated with climate change, particularly managing and reducing flood risk	ENV6 make best use of water resources, reduce pollution and encourage sustainable waste management	ECON1 improve the performance of the local and City-wide economy to provide opportunity for all	ECON2 promote the vitality of local centres	ECON3 promote the regeneration of areas across the City	ECON4 encourage investment in learning and skills development	SOC1 ensure equitable access to community services and facilities	SOC2 provide decent and affordable housing for all meet local needs	SOC3 promotes health and well-being	SCO4 reduce crime, the fear of crime and antisocial behaviour	SOC5 enable communities to influence the decisions that affect their neighbourhoods and quality of life
DM6 Noise and Vibration	~	++?	~	~	~	~	~	~	~	~	~	~	++	~	~
DM7 Advertisements	~	+++	~	+++	~	~	+++	+++	~	~	~	~	~	~	+
DM8 Places of worship and other faith related community facilities	+++	+++	+++	+++	~	~	~	+++	+++	~	+++	~	+++	~	+++
DM9 Day nurseries and early years provision	~	+	+++	~	~	~	++?	+	~	++?	++?	~	++?	~	~
DM10 Standards for residential development	~	+++	~	~	~	~	+++	+++	~	~	~	~	+++	~	~
DM11 Houses in multiple occupation (HMO)	+++	~	~	+++	~	~	~	~	~	~	~	+++	~	+++	+++

	ENV1 optimise use of previously developed land	ENV2 apply high standards of design, construction and maintenance	ENV3 encourage sustainable methods of transport and reduce the need to travel	ENV4 protect and enhance Birmingham's cultural and natural heritage	ENV5 anticipate and respond to the challenges associated with climate change, particularly managing and reducing flood risk	ENV6 make best use of water resources, reduce pollution and encourage sustainable waste management	ECON1 improve the performance of the local and City-wide economy to provide opportunity for all	ECON2 promote the vitality of local centres	ECON3 promote the regeneration of areas across the City	ECON4 encourage investment in learning and skills development	SOC1 ensure equitable access to community services and facilities	SOC2 provide decent and affordable housing for all meet local needs	SOC3 promotes health and well-being	SCO4 reduce crime, the fear of crime and antisocial behaviour	SOC5 enable communities to influence the decisions that affect their neighbourhoods and quality of life	
DM12 Residential conversions and specialist accommodation	++?	++	~	++?	~	~	~	~	~	~	~	++?	~	++?	++?	
DM13 Self and custom-build housing	+?	+?	~	~	~	~	~	~	+	++?	~	++	+?	~	++?	
DM14 Highway Safety and Access	~	+	++	+	~	~	~	++	~	~	+	~	+	~	++?	
DM15 Parking	~	+	++?	+	~	~	~	++	~	~	+	~	+	~	++	
DM16 Telecommunications	~	+	+	+	~	~	+	+	+	+	+	~	+	~	+	
Cumulative Effect of all Policies	~/+/ ++?	+/++?	~/+/ ++?	+/++?	~/++	~/++	~/+/ ++?	+/++?	~/+/ +	~/+/ +	~/+	~/+	~/++?	+/++?	~/++?	~/+/ ++?

*Sustainability Appraisal Scoring*

Score Key:	++ <b>Significant positive effect</b>	+ <b>Minor positive effect</b>	0 <b>No overall effect</b>	- <b>Minor negative effect</b>	-- <b>Significant negative effect</b>	? <b>Score uncertain</b>	~ <b>No clear relationship</b>
<p>NB: where more than one symbol is presented in a box it indicates that the appraisal has found more than one score for the category. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</p>							

## 4.4 Summary of the Habitats Regulations Assessment (HRA)

4.4.1 BCC has reviewed the DM DPD against the requirements of Regulation 105 of the Habitats Regulations; this review has drawn on the evidence gathered by the 2013 HRA<sup>21</sup> undertaken for the Birmingham Development Plan and a technical review, taking into account the scope and content of the Development Management DPD. The 2013 HRA established that there were unlikely to be any significant adverse effects on any European site as follows:

*E1 This HRA report has carefully considered the effects that might be associated with development as part of the Pre-Submission Version of the BDP. Having previously screened the BDP options, this report has revisited assessments made during November 2012 and assessed new content in the latest version of the plan.*

*E2 There are no European sites in the City of Birmingham. Of those that have been identified from a 20km area of search and others that have been included through hydrological pathways that lie beyond this search zone, none are expected to experience adverse effects from proposals in the BDP. Earlier assessment in November 2012 recommended that the issues of air quality, disturbance from recreation, water supply and treatment be explored as part of further HRA work. These issues have been appraised along with several other identified vulnerabilities of European sites.*

*E3 The following 14 sites were included in this HRA report:*

*• Cannock Chase SAC; • Cannock Extension Canal SAC; • Elan Valley Woodlands SAC; • Elenydd SAC; • Elenydd-Mallaen SPA; • Ensor's Pool SAC; • Fens Pools SAC; • Humber Estuary SAC; • Humber Estuary SPA; • Humber Estuary Ramsar; • River Mease SAC; • Severn Estuary SAC; • Severn Estuary SPA; and • Severn Estuary Ramsar.*

*E4 The Pre-Submission Version of the BDP is not likely to lead to adverse effects on any European sites alone or in-combination with other plans. There is no requirement to prepare an appropriate assessment.*

4.4.2 The technical review has determined that the significant effects considered in the 2013 HRA remain relevant, valid and can be relied upon, when considering the effects of the Development Management DPD. It is noted that the Development Management DPD will not introduce any new effect pathways. The review has concluded that the Development Management DPD will have no significant effects on any European sites as a result of its implementation as it is an expansion and clarification of the strategic policies of the BDP, which itself was determined not to have any likely significant effects on European sites, either alone, or in combination with other plans.

## 4.5 Proposed mitigation measures

4.5.1 When considering planning policies, mitigation can usually be in the form of policy amendments. For the Development Management DPD preferred policies, there are no recommendations for the modification of the range of policies. This reflects the positive scores, the absence of negative effects and the intention to use the policies in combination with the policies of the BDP, which for each policy are cross-referenced.

<sup>21</sup> Lepus Consulting (October 2013) Habitats Regulations Assessment of the Birmingham Development Plan: Pre-Submission Version [https://www.birmingham.gov.uk/download/downloads/id/1523/sub6\\_pre-submission\\_habitat\\_regulations\\_assessment\\_2013.pdf](https://www.birmingham.gov.uk/download/downloads/id/1523/sub6_pre-submission_habitat_regulations_assessment_2013.pdf)

4.5.2 Whilst there are no recommendations for the amendment of policy wording, the following general points can be made in respect of the presentation of the policies in order to make clearer how they will be implemented:

- ▶ Ensure that, wherever possible, the specific criteria against which the policy will be implemented and monitored are included.
- ▶ For each DM policy, provide further detail against the cited BDP policies on how these will work together.
- ▶ Set out more clearly in paragraph 1.10 of the DPD which matters are covered by the BDP, such as the control of various forms of retail development.

## 4.6 Uncertainties and risks

4.6.1 The principal uncertainties centre on the implementation of the policies and the inevitable variability associated with case-by-case judgements. However, any unintended sustainability effects are likely to be localised, and monitoring of implementation is an important part of development management. It is through this mechanism that consistency of implementation and unintended consequences (and hence potential effects on sustainability) should be identified. Monitoring activity has been undertaken for policies applied as part of the Unitary Development Plan and lessons learnt in the development of new policies. It can be assumed therefore that the new policies are more sophisticated and should therefore yield more sustainable effects. Nevertheless, many of the scores retain a '?' to indicate that there is uncertainty associated with their effects.



## 5. Next steps

### 5.1 Preparation of the Submission Development Management DPD

- 5.1.1 Following consultation and an analysis of the responses, the Council will revise the Publication Draft Development Management DPD which will be subject to a statutory period of public consultation. Following this, a Submission Development Management DPD will be produced. This will be submitted for consideration by an independent planning inspector.

### 5.2 Finalising the SA Report and Post Adoption Statement

- 5.2.1 Following EiP, and subject to any significant changes to the draft DPD that may require appraisal, the Council will issue a Post Adoption Statement (PAS) as soon as reasonably practicable after the adoption of the DPD. The PAS will set out the results of the consultation and SA processes and the extent to which the findings of the SA have been accommodated in the adopted DPD.

### 5.3 Monitoring Requirements

- 5.3.1 Following adoption of the Development Management DPD, there will need to be monitoring of any significant effects identified. Monitoring the sustainability effects of implementing the Development Management DPD should be conducted as part of an overall approach to monitoring the sustainability effects of the BDP and various SPDs across the City. An Authority Monitoring Report is already produced for the BDP. This does not currently cover DM-related matters and this could be refined to reflect the content of the Development Management DPD and combined with the monitoring of potential sustainability effects.
- 5.3.2 **Table 5.1** sets out a number of potential indicators for monitoring the potential significant sustainability effects of implementing the Development Management DPD, drawing on those set out in Table 3.1 above which relate to sustainability objectives. Note that the indicators proposed are included as suggestions at this stage, as it is recognised that many datasets may not be available for monitoring some of the sustainability effects of the Development Management DPD, and that the indicators included may change once the City Council finalises the monitoring framework for the DPD itself. The data used for monitoring could be provided by outside bodies.

Table 5.1 Potential monitoring indicators for the Development Management DPD

Policy	Potential Indicator(s)
DM1 Air Quality	BDP AQ monitoring Change to/within Air Quality Management Areas Effects on human health and biodiversity
DM2 Amenity	Development Management (DM) statistics on applications refused as contrary to policy Development affecting natural assets including open space Effects on heritage assets and biodiversity

<b>Policy</b>	<b>Potential Indicator(s)</b>
DM3 Land affected by contamination, instability and hazardous substances	DM statistics on applications with contamination/stability issues Proportion of new development on previously developed land
DM4 Landscaping and trees	BDP monitoring of city-greening DM statistics on conditions attached to applications
DM5 Light Pollution	DM statistics on applications refused as contrary to policy Effects on heritage assets and biodiversity
DM6 Noise and Vibration	DM statistics on applications refused as contrary to policy Noise complaints Effects on heritage assets and biodiversity
DM7 Advertisements	DM statistics on applications refused as contrary to policy Effects on heritage assets
DM8 Places of worship and other faith related community facilities	DM statistics on applications Accessibility indices of key facilities
DM9 Day nurseries and early years provision	DM statistics on applications refused as contrary to policy Accessibility indices of key facilities
DM10 Standards for residential development	DM statistics on applications refused as contrary to policy
DM11 Houses in Multiple Occupation (HMO)	DM statistics on applications refused as contrary to policy
DM12 Residential conversions and specialist accommodation	DM statistics on applications refused as contrary to policy
DM13 Self and custom-build housing	DM statistics on applications
DM14 Highway Safety and Access	DM statistics on applications refused as contrary to policy
DM15 Parking and Servicing	DM statistics on applications refused as contrary to policy
DM16 Telecommunications	DM statistics on applications Effects on heritage assets and biodiversity

## 5.4 Quality Assurance Checklist

5.4.1 The Government’s Guidance on SEA<sup>22</sup> contains a quality assurance checklist to help ensure that the requirements of the SEA Directive are met. This has been completed for the Development Management DPD in **Table 5.2**.

Table 5.2 Completed Quality Assurance Checklist for the Development Management DPD

Objectives and Context	
<ul style="list-style-type: none"> <li>The plan’s purpose and objectives are made clear.</li> </ul>	Section 1.4
<ul style="list-style-type: none"> <li>Sustainability issues, including international and EC objectives, are considered in developing objectives and targets.</li> </ul>	Key sustainability issues identified through a review of relevant plans and programmes (see Section 2) and analysis of baseline conditions (see Section 2) have informed the development of the SA Framework presented in Section 3.
<ul style="list-style-type: none"> <li>SEA objectives are clearly set out and linked to indicators and targets where appropriate.</li> </ul>	Section 3.1 presents the SA objectives and guide questions.
<ul style="list-style-type: none"> <li>Links with other related plans, programmes and policies are identified and explained.</li> </ul>	A review of related plans and programmes is presented in Section 2 of this SA Report.
Scoping	
<ul style="list-style-type: none"> <li>The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report.</li> </ul>	The environmental bodies were consulted on the Scoping Report in March 2015 and August 2018.
<ul style="list-style-type: none"> <li>The assessment focuses on significant issues.</li> </ul>	Sustainability issues have been identified in the baseline analysis contained in Section 2 of this SA Report on a topic-by-topic basis. Section 2.2 summarises the key sustainability issues identified.
<ul style="list-style-type: none"> <li>Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.</li> </ul>	Section 3.6 of this SA Report sets out the difficulties, uncertainties and assumptions.
<ul style="list-style-type: none"> <li>Reasons are given for eliminating issues from further consideration.</li> </ul>	No issues have been knowingly eliminated from this SA Report.
Baseline Information	
<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and their likely evolution without the plan are described.</li> </ul>	Section 2 and Appendix B of this SA Report presents the baseline analysis of the City’s social, economic and environmental characteristics including their likely evolution without the Local Plan.
<ul style="list-style-type: none"> <li>Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable.</li> </ul>	Throughout Section 2 of this SA Report, reference is made to areas which may be affected by the Local Plan.
<ul style="list-style-type: none"> <li>Difficulties such as deficiencies in information or methods are explained.</li> </ul>	Section 3.6 of this SA Report sets out the difficulties, uncertainties and assumptions.
Prediction and evaluation of likely significant effects	
<ul style="list-style-type: none"> <li>Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant.</li> </ul>	Section 4 summarises the appraisal of the sustainability performance of the Pre-Submission Local Plan in terms of the Local Plan Vision and Spatial Principles, preferred development requirements and Spatial Strategy, site allocations and policies. Detailed appraisal matrices are

<sup>22</sup> (Former) Office of the Deputy Prime Minister (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*.



<ul style="list-style-type: none"> <li>Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed.</li> <li>Likely secondary, cumulative and synergistic effects are identified where practicable.</li> <li>Inter-relationships between effects are considered where practicable.</li> <li>Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds.</li> <li>Methods used to evaluate the effects are described.</li> </ul>	<p>set out in Appendix A that have been developed to meet the requirements of the SEA Directive.</p> <p>Positive and negative effects are considered within the appraisal matrices and within Section 4. Potential effects are identified in the short, medium and long-term.</p> <p>The cumulative effects of the Plan are considered in Appendix A and summarised in Section 4 where relevant.</p> <p>Inter-relationships between effects are identified in the assessment commentary, where appropriate.</p> <p>These are identified in the commentary, where appropriate.</p> <p>These are described in Section 3.</p>
--	--

### Mitigation measures

<ul style="list-style-type: none"> <li>Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated.</li> <li>Issues to be taken into account in development consents are identified.</li> </ul>	<p>These are identified within the appraisal matrices.</p> <p>These are identified within the appraisal matrices.</p>
---	---

### The SA Report

<ul style="list-style-type: none"> <li>Is clear and concise in its layout and presentation.</li> <li>Uses simple, clear language and avoids or explains technical terms. Uses maps and other illustrations where appropriate.</li> <li>Explains the methodology used. Explains who was consulted and what methods of consultation were used.</li> <li>Identifies sources of information, including expert judgement and matters of opinion.</li> <li>Contains a non-technical summary</li> </ul>	<p>The SA Report is clear and concise.</p> <p>Maps and tables have been used to present the baseline information in Appendix B where appropriate.</p> <p>Section 3 presents the proposed methodology to be used for assessment whilst consultation arrangements are discussed in Section 1.</p> <p>Information is referenced throughout the SA Report.</p> <p>Included.</p>
--	---

### Consultation

<ul style="list-style-type: none"> <li>The SEA is consulted on as an integral part of the plan-making process.</li> <li>The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and SA Report.</li> </ul>	<p>This SA Report is being consulted upon along with the Publication Draft Development Management DPD.</p> <p>The emerging Plan and SA have been made available for consultation in line with planning regulations.</p>
--	---

### Decision-making and information on the decision

<ul style="list-style-type: none"> <li>The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan.</li> <li>An explanation is given of how they have been taken into account.</li> <li>Reasons are given for choices in the adopted plan, in the light of other reasonable options considered.</li> </ul>	<p>Responses received to this SA Report will inform the preparation of the Submission Draft Development Management DPD. They will also be summarised in the Post Adoption Statement.</p> <p>This information will be provided in subsequent reports.</p> <p>These will be present in the Post Adoption Statement.</p>
---	---

# Appendix A

## Policy Appraisal

### Sustainability Appraisal Scoring

Score Key:	++ Significant positive effect	+ Minor positive effect	0 No overall effect	- Minor negative effect	-- Significant negative effect	? Score uncertain	~ No clear relationship
<p>NB: where more than one symbol is presented in a box it indicates that the appraisal has found more than one score for the category. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</p> <p>Potential cumulative, synergistic and temporal effects reflect the likely city-wide application of the policy over the short, medium and longer term (short term (0 - 10 years), medium term (between 10 and 25 years) and long term (&gt;25 years))</p>							

Policy	Reasonable Alternatives
DM1 Air Quality	<ul style="list-style-type: none"> <li>None – a policy is required by National Policy</li> </ul>
DM2 Amenity	<ul style="list-style-type: none"> <li>No policy – rely on National Policy</li> </ul>
DM3 Land affected by contamination, instability and hazardous substances	<ul style="list-style-type: none"> <li>None – a policy is required by Legislation</li> </ul>
DM4 Landscaping and Trees	<ul style="list-style-type: none"> <li>None – a policy is required by National Policy</li> </ul>
DM5 Light Pollution	<ul style="list-style-type: none"> <li>None – a policy is required by National Policy</li> </ul>
DM6 Noise and Vibration	<ul style="list-style-type: none"> <li>None – a policy is required by National Policy</li> </ul>



Policy	Reasonable Alternatives
DM7 Advertisements	<ul style="list-style-type: none"> <li>No policy</li> </ul>
DM8 Places of Worship and Faith-related Community Facilities	<ul style="list-style-type: none"> <li>Retain existing UDP policy</li> <li>No policy</li> </ul>
DM9 Day Nurseries and Childcare Provision	<ul style="list-style-type: none"> <li>Retain existing UDP policy</li> <li>No policy</li> </ul>
DM10 Standards for Residential Development	<ul style="list-style-type: none"> <li>Retain existing UDP policy</li> <li>No minimum space standards or policy</li> </ul>
DM11 Houses in Multiple Occupation	<ul style="list-style-type: none"> <li>Retain existing UDP policy</li> <li>No policy</li> <li>Less prescriptive policy</li> </ul>
DM12 Residential conversions and specialist accommodation	<ul style="list-style-type: none"> <li>No policy</li> </ul>
DM13 Self and Custom-Build Housing	<ul style="list-style-type: none"> <li>No policy</li> </ul>
DM14 Highway safety and access	<ul style="list-style-type: none"> <li>None – a policy is required by National Policy</li> </ul>
DM15 Parking and Servicing	<ul style="list-style-type: none"> <li>No policy</li> </ul>
DM16 Telecommunications	<ul style="list-style-type: none"> <li>No policy</li> </ul>

## Policy DM1 Air Quality

Policy Content	Options Considered
<ol style="list-style-type: none"> <li>Development proposals will need to contribute to the management of air quality and support the objectives of the local Air Quality Action Plan and Clean Air Zone. Development that would, in isolation or cumulatively, lead to an unacceptable deterioration* in air quality, result in exceedances of nationally or locally set objectives for air quality, particularly for nitrogen dioxide, or increase exposure to unacceptable levels of air pollution, will not be considered favourably.</li> <li>Mitigation measures such as low and zero carbon energy, green infrastructure and sustainable transport can help to reduce and/ or manage air quality impacts and will be proportionate to the background air quality in the vicinity, including Clean Air Zone designations.</li> <li>The development of fuelling stations for low emission and electric vehicles will be supported in principle where they establish a network of facilities to support the City's transport and air quality objectives. New or extended fuelling stations for petrol and diesel vehicles would need to be justified on the basis of addressing clear gaps in existing provision, demonstrate compliance with Part 1 of this policy and provide fuelling for low emission and electric vehicles.</li> </ol> <p>* As defined in paragraph 2.7</p>	<ul style="list-style-type: none"> <li>None – a policy is required by National Policy</li> </ul>

SA Objective	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	++?	Consistent application of standards which encourage high environmental quality will help to secure better quality buildings across the city to the benefit of sustainability over the longer term. The speed and depth of this change is uncertain, however.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+	Measures to reduce air pollution through the use of Travel Plan will help to promote sustainable transport, contributing sustainability across the City. However, these measures are unlikely to significantly address air quality issues generated by road traffic.
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~	No clear relationship

SA Objective	New Policy	Commentary
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	++?	Consistent application of standards which encourage high environmental quality will help to secure better quality buildings across the city to the benefit of sustainability over the longer term. The speed and depth of this change is uncertain, however.
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	Enhancement of the City's environmental quality will make a contribution to the City's economic success.
ECON2 To help promote the vitality of local centres	~	No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	+	Enhancement of the City's environmental quality will make a contribution to the City's economic success.
ECON4 To encourage investment in learning and skills development	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	++	Clear, consistent policies which seek high environmental standards in new development and in turn will contribute to health and well-being.

SA Objective	New Policy	Commentary
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	No clear relationship

**Commentary**

A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes and the wider objectives and policies established in the BDP for the enhancement of air quality across the City through various means. The outcome of policy implementation is likely to be enhanced sustainability performance, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. The policy could benefit from the inclusion of examples of measures against which the policy will be implemented and measured. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

**BCC Background - DM1 Air Quality:**

Government has determined the need for Birmingham to introduce a Clean Air Zone (CAZ) to control road transport related emissions particularly NO2. The Council’s Cabinet has approved the preferred measures for a Birmingham Clean Air Zone that will seek to achieve air quality compliance with UK and EU statutory NO2 limits in the shortest time possible, as part of a longer term air quality programme. The positive management of air quality is a priority for the City, and it is imperative that development does not undermine the objectives of the CAZ, specifically that compliance within the CAZ is maintained and that no other areas become subject to requiring the declaration of a CAZ.

The AQAP, BDP and Birmingham Connected (the City Council’s transport strategy) provide the framework to improve air quality in the city, including measures to encourage walking, cycling and the use of public transport, together with the support for the uptake of cleaner vehicle technologies through infrastructure provision, fleet transition and travel behaviour changes. New developments have the potential to adversely affect air quality or be affected by air quality. This particularly relates to development that would trigger an Air Quality Assessment (AQA) as set out in the Local Validation Requirements. The assessment and mitigation approach contained within the West Midlands Low Emissions Towns and Cities Programme: Good Practice Air Quality Planning Guidance (2014) (or any subsequent future replacement) should be utilised to assess where relevant exposure may arise, calculate the emission damage costs and identify mitigation. ‘Unacceptable’ deterioration is defined as where the development would result in exposure to pollutant concentrations close to the limit values.



AQAs must outline the current and predicted future pollutant concentrations at, and in the vicinity of, the development site. The AQA should also consider any potential cumulative impacts on air quality arising from planned development in the vicinity of the development site. The AQA should set out the planned mitigation measures to address any negative impacts. Mitigation measures should be provided on-site, however where this is impractical the AQA should demonstrate that it is possible to include measures in the local area which have equivalent air quality benefits. Mitigation measures may be secured either by planning condition or legal agreement where appropriate. Any impacts upon air quality will be considered in the context of the benefits the development brings to the City.

Mitigation measures will include ensuring that developments are designed to ensure walking and cycling is an obvious choice for short trips and that there is good public transport access to contribute towards the reduction in emissions, particularly nitrogen oxides and particulate matter. Where appropriate, new development should include low emission vehicle charging points as part of their parking provision, and consideration should be given to options to introduce car clubs as an alternative model of car ownership.

Birmingham City Council; Air Quality Annual Status Report (November 2017) (2018 version now also available via the same link)

[https://www.birmingham.gov.uk/downloads/download/1488/air\\_quality\\_annual\\_status\\_report](https://www.birmingham.gov.uk/downloads/download/1488/air_quality_annual_status_report)

Birmingham City Council; Clean Air Zone - Full Business Case & Cabinet Report (December 2018)

[https://www.birmingham.gov.uk/info/20076/pollution/1763/a\\_clean\\_air\\_zone\\_for\\_birmingham/8](https://www.birmingham.gov.uk/info/20076/pollution/1763/a_clean_air_zone_for_birmingham/8)

Environmental Protection UK & Institute of Air Quality Management; Guidance on land-use planning and development control: Planning for air quality (Jan 2017) <https://iaqm.co.uk/guidance/>

HM Government; Road to Zero Strategy (July 2018) <https://www.gov.uk/government/publications/reducing-emissions-from-road-transport-road-to-zero-strategy>

Low Emissions Towns and Cities Programme; Good Practice Air Quality Planning Guidance (May 2014)

[https://go.walsall.gov.uk/low\\_emissions\\_towns\\_and\\_cities\\_programme](https://go.walsall.gov.uk/low_emissions_towns_and_cities_programme)

Birmingham City Council, Draft Clean Air Strategy (February 2019)

<https://www.birminghambeheard.org.uk/economy/clean-air-strategy-consultation/>

Birmingham City Council, Air Quality Action Plan (2011) (pdf)

Department of Chemical Engineering, School of Chemistry, University of Murcia, Spain; Assessing the impact of petrol stations on their immediate surroundings (2010) (pdf)

## Policy DM2 Amenity

Policy Content	Options Considered
<p>All development will need to be appropriate to its location and not result in unacceptable adverse impacts on the amenity of occupiers and neighbours. In assessing the impact of development on amenity, the following will be considered:</p> <ol style="list-style-type: none"> <li>Visual privacy and overlooking;</li> <li>Sunlight, daylight, overshadowing;</li> <li>Aspect and outlook;</li> <li>Access to high quality and useable amenity space;</li> <li>Noise, vibration, odour, fumes, dust, air or artificial light pollution;</li> <li>Safety considerations, crime, fear for crime and anti-social behaviour;</li> <li>Compatibility of adjacent uses; and</li> <li>The individual and cumulative impacts of development proposals in the vicinity on amenity.</li> </ol>	<ul style="list-style-type: none"> <li>No policy – rely on National Policy</li> </ul>

SA Objective	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	-	++	Clear design and environmental quality expectations will help to ensure that there is a strong reference point against which development proposals can be assessed for their quality and contribution to achieving sustainable neighbourhoods and design quality across the City.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham’s cultural and natural heritage	-	++	Implicit in the criteria-based approach of the policies is sensitivity towards the context into which new development will be placed.

SA Objective	No policy	New policy	Commentary
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	-	++	Attractive and sustainable design will contribute to the City's image as a progressive and responsible place in which to invest.
ECON2 To help promote the vitality of local centres	-	++	Attractive and sustainable design will contribute to the success and rejuvenation of local centres.
ECON3 To promote the regeneration of areas across the City through appropriate development	-	++	Attractive and sustainable design will contribute to the regeneration of the City through helping to produce attractive and successful places.
ECON4 To encourage investment in learning and skills development	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	-	++	Good design, by its nature, promotes health and well-being, through the promotion of amenity and local environmental quality.

SA Objective	No policy	New policy	Commentary
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	~	No clear relationship

**Commentary**

Good design is important to securing sustainable development through balancing a wide variety of environmental and social considerations. The detailed criteria within DM2 against which developments will be considered serve to ensure that development takes account of the specific matters which help to make the City and its neighbourhoods attractive and successful places to live. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address design issues yields more positive sustainability outcomes than the reasonable alternative presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

**BCC Background - DM2 Amenity:**

The built-up nature of Birmingham presents opportunities for new uses to address and improve the amenity of the City. This can be achieved by ensuring that all developments are suitably located, well designed, adequately separated from neighbouring uses and operate in an appropriate way for the area in which they are located.

The protection of amenity covers both living and working conditions. This means firstly that new development should provide for adequate day to day living and working conditions for those who will be occupying it. Secondly, it means that development should not have undesirable amenity impacts on the living conditions of neighbouring residents or compromise the continued operation of uses and activities which are already established in the locality. The NPPF is clear (with particular reference to noise) that businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.

It may be necessary to apply planning conditions to new developments to ensure amenity standards are maintained such as hours of operation, requirements for ventilation equipment to be properly maintained, and delivery times.

Birmingham City Council; Birmingham Design Guide Vision Document (2015) <https://www.birminghambeheard.org.uk/economy/birmingham-design-guide-vision/>





Birmingham Design Guide SPD (in preparation)

Birmingham City Council, Places for All

[https://www.birmingham.gov.uk/directory\\_record/682/places\\_for\\_all](https://www.birmingham.gov.uk/directory_record/682/places_for_all)

Birmingham City Council, Places for Living

[https://www.birmingham.gov.uk/directory\\_record/683/places\\_for\\_living](https://www.birmingham.gov.uk/directory_record/683/places_for_living)



**Policy DM3 Land affected by contamination, instability and hazardous substances**

Policy Content	Options Considered
<ol style="list-style-type: none"> <li>Proposals for new development will need to ensure that risks associated with land contamination and instability are fully investigated and addressed by appropriate measures to minimise or mitigate any harmful effects to human health and the environment within the development and the surrounding area and/ or groundwater.</li> <li>All proposals for new development on land which is known to be, or potentially, contaminated or unstable, will be required to submit a preliminary risk assessment, and where appropriate, a risk management and remediation strategy based on detailed site investigation to remove risks to both the development and the surrounding area and/ or groundwater.</li> <li>Proposals for development of new hazardous installations, or development located within the vicinity of existing hazardous installations, will only be permitted where it is demonstrated that necessary safeguards, in consultation with the Control of Major Accidents Hazards (COMAH) competent authority, are incorporated to ensure the development is safe; and that it supports the spatial delivery of growth as set out in the Birmingham Development Plan.</li> </ol>	<ul style="list-style-type: none"> <li>None – a policy is required by National Policy</li> </ul>

SA Objective	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	++	Redevelopment of brownfield land is a priority of the BDP and environmental quality policies will be an important part of realising this key objective through ensuring that the development process and its outputs are undertaken with reference to clear standards. A specific policy on contamination and stability is particularly important in respect of use the previously developed land.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	~	No clear relationship
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham’s cultural and natural heritage	~	No clear relationship



SA Objective	New Policy	Commentary
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	++?	Consistent application of standards which encourage high environmental quality will help to secure better quality buildings across the city to the benefit of sustainability over the longer term. The speed and depth of this change is uncertain, however.
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	Enhancement of the City's environmental quality will make a contribution to the City's economic success.
ECON2 To help promote the vitality of local centres	~	No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	+	Enhancement of the City's environmental quality will make a contribution to the City's economic success.
ECON4 To encourage investment in learning and skills development	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	++	Clear, consistent policies which seek high environmental standards in new development will contribute to health and well-being.

SA Objective	New Policy	Commentary
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	No clear relationship

### Commentary

A policy which clearly addresses environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

### BCC Background - DM3 Land affected by contamination, instability and hazardous substances:

Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner. When development is proposed on or adjacent to land that is known or suspected to be affected by contamination and/ or instability, or where development is proposed that would be sensitive to these risks, proposals for development should be accompanied by an appropriate level of supporting information. Early engagement with the local planning authority and environmental health, particularly if the land is determined as contaminated land under Part 2A of the Environmental Protection Act 1990, will clarify what assessment is needed to support the application and issues that need to be considered in the design of a development.

A preliminary risk assessment will be required to identify the nature and extent of contamination and/or instability. Where the assessment identifies significant harmful risk to human health or the environment, the Council will require a full ground investigation and a risk assessment management and remediation strategy. The Environment Agency will also have an interest in the case of 'special sites' designated under Part 2A of the Environmental Protection Act 1990 and all sites where there is a risk of pollution to controlled waters. Remediation will need to meet their requirements. The developer should also check whether an environmental permit is required before development can start. See also BDP Policy TP6 Management of flood risk and water resources.

Remedial measures will need to be carried out in line with current legislation, guidelines and best practice, including applying the Environment Agency's principles in managing risks to groundwater (the precautionary principle, risk based approach and groundwater protection hierarchy).

Environment Agency; Land Contamination: Technical Guidance (2014, updated 2016) <https://www.gov.uk/government/collections/land-contamination-technical-guidance>

Health & Safety Executive; Land Use Planning Methodology Guidance <http://www.hse.gov.uk/landuseplanning/>

MHCLG, Planning Practice Guidance, Land affected by Contamination (July 2019)  
<https://www.gov.uk/guidance/land-affected-by-contamination>.

MHCLG, Planning Practice Guidance, Land instability (July 2019)  
<https://www.gov.uk/guidance/land-stability>

MHCLG, Planning Practice Guidance, Hazardous substances (March 2019)  
<https://www.gov.uk/guidance/hazardous-substances>

## Policy DM4 Landscaping and Trees

Policy Content	Options Considered
<p><b>Landscaping</b></p> <ol style="list-style-type: none"> <li>All developments must take opportunities to provide high quality landscapes and townscapes that enhance existing landscape character and the green infrastructure network, contributing to the creation of high quality places and a coherent and resilient ecological network.</li> <li>The composition of the proposed landscape should be appropriate to the setting and the development, as set out in a Landscape Plan*, with opportunities taken to maximise the provision of new trees and other green infrastructure, create or enhance links from the site to adjacent green infrastructure and support objectives for habitat creation and enhancement as set out in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022 and subsequent revisions.</li> </ol>	<ul style="list-style-type: none"> <li>None – a policy is required by National Policy</li> </ul>
<p><b>Trees, woodland and hedgerow protection</b></p> <ol style="list-style-type: none"> <li>Development proposals must seek to avoid the loss of, and minimise the risk of harm to, existing trees, woodland, and/or hedgerows of visual or nature conservation value, including but not limited to trees or woodland which are subject to a Tree Preservation Order, or which are designated as Ancient Woodland or Ancient/ Veteran Trees. Where trees and/or woodlands are proposed to be lost as a part of development this loss must be justified as a part of an Arboricultural Impact Assessment (AIA) submitted with the application.</li> <li>Where a proposed development retains existing trees or hedgerows on site, or where there is an incursion into a tree root protection area, provision must be made for their protection during the demolition and construction phase of development with monitoring and mitigation measures being put in place to ensure that development works do not have an adverse impact on retained trees, hedgerows and associated wildlife.</li> <li>To ensure that the benefits of proposed development outweigh the harm resulting from the loss of any trees, woodlands or hedgerows, adequate replacement planting will be required to the satisfaction of the Council. Replacement should be provided on-site unless the developer can justify why this is not achievable. Where on-site replacement is not achievable, contributions to off-site tree planting will be sought through a Section 106 Agreement.</li> </ol>	

\* see the adopted Local Validation Criteria

SA Objective	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	No clear relationship



SA Objective	New Policy	Commentary
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	++	Trees and landscaping are very often a critical aspect of good design.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	++	Trees and landscaping can very often be central to achieving high quality development which contributes to its context.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	++	Trees and landscaping will be increasingly important in ensuring that climate change is managed, such as through shading and part of wider flood risk management for vulnerable locations.
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	++	Trees and landscaping are central to assisting pollution reduction and mitigation through filtration of air and water, for example.
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	++	Trees and landscaping contribute to a high quality environment which is attractive to investors, in turn enhancing prosperity.
ECON2 To help promote the vitality of local centres	++	Trees and landscaping contribute to a high quality environment which is attractive to investors, in turn enhancing prosperity.
ECON3 To promote the regeneration of areas across the City through appropriate development	++	Trees and landscaping contribute to a high quality environment which is attractive to investors, in turn enhancing prosperity.
ECON4 To encourage investment in learning and skills development	~	No clear relationship



SA Objective	New Policy	Commentary
SOC1 To help ensure equitable access to community services and facilities	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	++	Trees and landscaping contribute to a high quality environment which contributes to health and well-being through aesthetic, pollution control and climate regulation functions.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	++	Trees and landscaping contribute to a high quality environment in which people can take pride.
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	No clear relationship

**Commentary**

Trees and landscaping are fundamental to a high quality and ultimately sustainable environment, contributing aesthetically and functionally to the quality of life across the City. Specification of expectations for design and use of trees and landscaping as part of new development will ensure that, in combination with other policies, high quality design is realised and wider sustainability enhancements are secured. There are no suggested changes to the content of the policy arising from the appraisal, other than cross-referencing Council Strategies relating to Green Infrastructure, for example. The option of developing a new policy to address trees and landscape issues yields more positive sustainability outcomes than the reasonable alternative presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

**BCC Background - DM4 Landscaping and Trees:**

New development has a clear role in supporting the City’s approach to green infrastructure, and can contribute to and enhance the landscape, provide biodiversity net gain and help to reduce the impact of climate change. Each development site will be able to contribute to the green infrastructure network in



appropriate ways reflecting the site context and location. The ecological network is currently described in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022, which identifies opportunities for habitat creation, restoration and enhancement within Core Ecological Areas, Ecological Linking Areas and Ecological Opportunity Areas. This strategy, and subsequent revisions, should be referenced to ensure new development is in keeping with the surrounding landscape and supports the maintenance of a resilient and coherent ecological network.

Trees and other vegetation make an important contribution to delivering sustainable development and high quality design. Protected trees, woodland and hedgerows should be retained as an integral part of the design of development except where their long-term survival would be compromised by their age or physical condition or there are exceptional circumstances such as, where the tree is considered to be imminently dangerous or its loss is significantly outweighed by the benefits of the proposed scheme and there are no viable development alternatives. Sufficient consideration must be given to retained trees and the proposed new use of the land around them, especially in respect of their long term viability, beneficial or adverse shade to buildings, perceived threat and building distances.

New trees, including trees on the highways should be provided with sufficient above and below ground planting space requirements (soil volumes, water supply and drainage) to allow for healthy growth to maturity without creating conflicts with buildings, pavements and utility infrastructure. Where appropriate a Landscape Management Plan will be required through a planning condition. Planting should be maintained in accordance with the plan and follow Secured by Design principles.

Birmingham City Council; Guide to Protected Trees (2016) [https://www.birmingham.gov.uk/downloads/download/275/a\\_guide\\_to\\_tree\\_preservation\\_orders](https://www.birmingham.gov.uk/downloads/download/275/a_guide_to_tree_preservation_orders)

Natural England; Green Infrastructure Guidance (2009) <http://publications.naturalengland.org.uk/publication/35033>

[Arboricultural Journal, Kerion J. Doick et al, CAVAT \(Capital Asset Value for Amenity Trees\): valuing amenity trees as public assets \(April 2019\)](https://www.tandfonline.com/doi/full/10.1080/03071375.2018.1454077)  
<https://www.tandfonline.com/doi/full/10.1080/03071375.2018.1454077>

Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022  
<https://www.bbcwildlife.org.uk/sites/default/files/2018-10/NIA%20Ecological%20Strategy%202017-22%20Summary.pdf>

Technical Report of the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022  
<https://www.bbcwildlife.org.uk/sites/default/files/2018-10/NIA%20Ecological%20Strategy%202017-22%20Technical%20Report.pdf>

Birmingham City Council, Green Living Spaces Plan (2013)  
<https://www.birmingham.gov.uk/greenlivingspaces>

Birmingham City Council, Sustainable Management of Urban Rivers & Floodplains SPD (2007)  
[https://www.birmingham.gov.uk/downloads/file/1166/sustainable\\_management\\_of\\_urban\\_rivers\\_and\\_floodplains\\_supplementary\\_planning\\_document](https://www.birmingham.gov.uk/downloads/file/1166/sustainable_management_of_urban_rivers_and_floodplains_supplementary_planning_document)

**Policy DM5 Light Pollution**

Development incorporating external lighting should make a positive contribution to the environment of the city and must seek to avoid or mitigate any potential adverse impacts from such lighting on amenity and public safety. Proposals for external lighting will need to demonstrate that the lighting is:

1. Appropriate for its purpose in its setting;
2. Designed to avoid or limit its impact on the privacy or amenity of its occupiers, nearby residents and other light sensitive uses/ areas, intrinsically dark landscapes, and nature conservation;
3. Designed to preserve or enhance the character or appearance of any heritage assets which are affected;
4. Designed to a high standard and well integrated into the proposal; and
5. Energy efficient

- None – a policy is required by National Policy

SA Objective	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	Well designed, low maintenance lighting will be encouraged as part of this policy.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	++	Sensitively designed lighting should ensure the protection and enhancement of the City's cultural heritage.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	No clear relationship



SA Objective	New Policy	Commentary
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	No clear relationship
ECON2 To help promote the vitality of local centres	+	Ensuring appropriate lighting design will contribute to the overall character of local centres.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	No clear relationship
ECON4 To encourage investment in learning and skills development	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	~	No clear relationship
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	+	Ensuring appropriate lighting design will contribute to crime reduction.



SA Objective	New Policy	Commentary
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	No clear relationship

### Commentary

A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance of developments reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

### BCC Background - DM5 Light Pollution:

Lighting associated with new developments should be designed in accordance with established industry standard guidance which is currently set out the Institute of Lighting Professionals. In particular, the use of low energy light sources will be encouraged. Detailed guidance on the design of lighting proposals will be included in the Birmingham Design Guide. The Planning Practice Guidance on Light Pollution also provides detailed guidance on how light pollution should be managed.

In applying the policy the Council will seek to limit the impact of artificial lighting on the local amenity and nature conservation (including ecological networks and blue and green infrastructure). Proposals involving or adjacent to designated and undesignated historic assets, must apply a lighting design appropriate to the asset, considering the architecture of the building to be illuminated and the impact this may have on the character of its surroundings.

BDP policy TP11 Sports facilities provides policy on sports facilities lighting. Advice and guidance is provided by and should be sought from Sport England on sports lighting proposals.

A Lighting Assessment Report/ Strategy (as set out in the Local Validation Requirements) could be required to detail the measures which will be implemented to minimise and control the level of illumination, glare, and spillage of light and retain dark landscapes to protect wildlife. Planning conditions may be imposed to restrict lighting levels and hours of use or require measures to be taken to minimise adverse effects.

Birmingham City Council; Lighting Places Strategy (2008)

[https://www.birmingham.gov.uk/directory\\_record/678/lighting\\_places\\_a\\_lighting\\_strategy\\_for\\_the\\_city\\_centre\\_and\\_local\\_centres\\_of\\_birmingham](https://www.birmingham.gov.uk/directory_record/678/lighting_places_a_lighting_strategy_for_the_city_centre_and_local_centres_of_birmingham)

## Policy DM6 Noise and Vibration

Development should be designed, managed and operated to reduce exposure to noise and vibration. The following will be taken into account when assessing development proposals:

- a. The location, design, layout and materials;
- b. Positioning of building services and circulation spaces;
- c. Measures to reduce or contain generated noise (e.g. sound insulation);
- d. Existing levels of background noise;
- e. Hours of operation and servicing; and
- f. the need to maintain adequate levels of natural light and ventilation to habitable areas of the development.

- None – a policy is required by National Policy

Noise and/or vibration-generating development must be accompanied by an assessment of the potential impact of any noise and/ or vibration generated by the development on the amenity of its occupiers, nearby residents and other noise sensitive uses/ areas, including nature conservation. Where potential adverse impact is identified, the development proposal shall include details on how the adverse impact will be reduced and /or mitigated.

Noise-sensitive development (such as residential uses, hospitals and schools) must be accompanied by an assessment of the impact of any existing and/ or planned sources of noise and vibration in the vicinity of the proposed development including transport infrastructure, entertainment/ cultural/ community facilities and commercial activity. Where potential adverse impact is identified, the development proposal shall include details on how the adverse impact will be reduced and /or mitigated.

SA Objective	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+?	Consistent application of standards which encourage high environmental quality will help to secure better quality buildings across the city to the benefit of sustainability over the longer term. The speed and depth of this change is uncertain, however.

SA Objective	New Policy	Commentary
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~	No clear relationship
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	No clear relationship
ECON2 To help promote the vitality of local centres	~	No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	~	No clear relationship
ECON4 To encourage investment in learning and skills development	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	No clear relationship

SA Objective	New Policy	Commentary
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	++	Clear, consistent policies which seek high environmental standards in new development will contribute to health and well-being.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	No clear relationship

**Commentary**

A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance of developments reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

**BCC Background - DM6 Noise and Vibration:**

Noise and vibration can have a significant impact on amenity of noise sensitive uses and on wildlife and habitats. For large or prolonged development, consideration should also be given to the potential noise and vibration impacts during construction as well as the post development phase. Sources of vibration include transportation (especially railways) and industrial processes.

As far as is practicable, noise sensitive developments should be located away from major sources of existing and/ or planned sources of noise unless an appropriate and robust scheme of mitigation is provided and the benefits of the proposal in terms of regeneration are considered to outweigh the impacts on



amenity and biodiversity. 'Planned' sources of noise mean sites in the nearby vicinity that are under construction; extant consents; sites that have planning consent which are not yet started; and sites which are allocated in the development plan.

The design of mitigation measures should have regard to the need to provide a satisfactory environment for future occupiers and take account of other material planning considerations such as urban design. Good design of developments, along with other actions, can help to mitigate any noise or vibration impacts. These include:

- Reduction and/or containment of the source of impact, and/ or protection of surrounding sensitive buildings.
- Layout to provide adequate distance between the source and sensitive buildings or areas, and/ or screening/buffers.
- Limiting operating times or activities of sources allowed on the site, and/or specifying acceptable limits.

Department for Environment, Food and Rural Affairs (DEFRA); Noise Policy Statement for England (2010) <https://www.gov.uk/government/publications/noise-policy-statement-for-england>

[Birmingham City Council, Planning Consultation Guidance Note Noise and Vibration \(pdf\)](#)

## Policy DM7 Advertisements

Policy Content	Options Considered
<p>Proposals for advertisements should be designed to a high standard and meet the following criteria:</p> <ol style="list-style-type: none"> <li>Suitably located, sited and designed having no detrimental impact on public safety or amenity, taking into account cumulative impact;</li> <li>Sympathetic to the character and appearance of their location, adjacent buildings and the building on which they are displayed having regard to their size, materials, construction, location and level of illumination; and</li> <li>Avoid proliferation or clutter of signage on the building and in the public realm.</li> <li>Not obscure architectural features of a building or extend beyond the edges or the roofline of buildings and respect the building's proportions and symmetry;</li> <li>Not create a dominant skyline feature when viewed against the immediate surroundings; and</li> <li>Designed to preserve or enhance the character or appearance of any heritage assets which are affected</li> </ol> <p>Illuminated advertisement and signs should seek to avoid or mitigate any potential adverse impact on uses/ areas sensitive to light such as nearby residential properties and other light sensitive uses/ areas, intrinsically dark landscapes, and nature conservation.</p> <p>The siting of advertisements hoardings will be resisted where visible from the M6 motorway or A38 Aston Expressway and purposefully designed to be read from the roadway and where the attention of drivers is likely to be distracted.</p>	<ul style="list-style-type: none"> <li>No policy – allow the market to select the location of such uses and use Environmental and Highway Regulations to control any nuisance.</li> <li>Develop a new policy</li> </ul>

SA Objective	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	-?	++?	Clear specification of locational, siting and design expectations will serve to enhance standards of implementation across the City.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	No clear relationship

SA Objective	No policy	New policy	Commentary
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	-?	++?	Clear specification of locational, siting and design expectations will serve to enhance standards of implementation across the City.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	-?	++?	Well controlled and sited advertising plays an important role in promoting the City's commercial vibrancy and image at local and City-wide scales.
ECON2 To help promote the vitality of local centres	-?	++?	Well controlled and sited advertising plays an important role in promoting the City's commercial vibrancy and image at local and City-wide scales.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	No clear relationship
ECON4 To encourage investment in learning and skills development	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	~	No clear relationship

SA Objective	No policy	New policy	Commentary
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	~	~	No clear relationship
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	-	+	An updated policy will provide the reference point for the consideration of likely effects on local amenity.

**Commentary**

A specific policy which clearly controls the siting and design of advertisements will provide an important reference point for ensuring that a range of sustainability benefits are secured, focused on enhancing economic development in the City whilst ensuring that residential amenity and City-wide amenity is protected. In all cases, the greater certainty and precision associated with an updated policy is likely to yield positive sustainability effects. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

**BCC Background - DM7 Advertisements:**

The display of advertisements is subject to a separate planning consent process as set out in The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended). Through the planning system, advertisements are subject to the consideration of impacts in the interests of amenity and public safety. The Planning Practice Guidance: Advertisement explains the control of the advertisement regime and provides detail in relation to



consideration affecting public safety and amenity. Detailed guidance on the design of advertisements, signs and shop fronts will be updated and included in the emerging Birmingham Design Guide SPD.

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007: <http://www.legislation.gov.uk/ukxi/2007/783/made>

[MHCLG, Planning Practice Guidance, Advertisements \(July 2019\): https://www.gov.uk/guidance/advertisements](https://www.gov.uk/guidance/advertisements)

## Policy DM8 Places of Worship and Faith-related Community Facilities

Policy Content	Options Considered
----------------	--------------------

The Council's preferred locations for the development of places of worship and faith related community uses are in the network of centres as defined in Policy TP21 of the Birmingham Development Plan. Proposals for development outside of the network of centres will be considered favourably where:

1. It is well located to the population the premises is to serve or is well served by means of walking, cycling and public transport;
2. It will not have an unacceptable adverse impact on local amenity, parking, public and highway safety; and
3. The site is appropriate for its purpose in its setting, suitable for the scale of the development and number of users proposed.

- Retain existing UDP policy
- No policy

\* means suitable for the development proposed.

SA Objective	Existing Policy	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	+?	-?	++?	There are opportunities to make productive re-use of buildings for these uses and a clear policy establishes the reference point for how this might best be achieved.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+?	-?	++?	A clear policy establishes the reference point for how design of these uses might best be achieved.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+?	-?	++?	Location of these uses will be considered in respect of their relationship with public transport network, thus encouraging sustainable travel patterns.
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+?	-?	++?	
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	No clear relationship

SA Objective	Existing Policy	No policy	New policy	Commentary
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	~	No clear relationship
ECON2 To help promote the vitality of local centres	++?	-?	+++?	Potential beneficial effects on local centres, particularly outside commercial hours.
ECON3 To promote the regeneration of areas across the City through appropriate development	++?	-?	+++?	Potential beneficial effect resulting from the re-use of buildings and the creation of a focus of activity.
ECON4 To encourage investment in learning and skills development	~	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	++?	-?	+++?	Having regard to the location of these facilities will help to promote equitable access.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	++?	-?	+++?	Part of the creation of a community focus wider beneficial effects.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~	No clear relationship

SA Objective	Existing Policy	No policy	New policy	Commentary
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+?	-?	++?	The policy sets out a clear reference point for how the location of these facilities will be considered.

**Commentary**

Ensuring the appropriate location and design of these uses will help to ensure that sustainable development is promoted, particularly having regard to equitable access through public transport and sensitive design ensuring that impacts on local amenity are minimised. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

**BCC Background - DM8 Places of Worship and Faith-related Community Facilities:**

The most appropriate locations for places of worship and faith related community uses is in the network of centres as is defined in Policy TP21 of the BDP. These are the most sustainable locations in terms of transport accessibility and parking. Other locations outside of the network of town centres will be considered favourably where the criteria outlined in the policy can be satisfactorily met. Proposals for places of worship and faith related community uses should also comply with other relevant local plan policies and guidance.

Development should be designed, managed and operated to reduce and/ or mitigate any potential adverse impact from noise on nearby residents. Consideration will be given to attaching conditions to any planning permission granted, which would help to reduce or eliminate such problems.

Proposals will need to include travel plans where appropriate and management plans to reduce the risk of vehicles parking inappropriately and causing an obstruction or having a detrimental impact on highway safety.

Additional ancillary activities such as weddings, funerals, and other special occasions are likely to lead to higher volumes of people and increased noise levels, traffic movements and parking demand. These can have an adverse impact on local amenity and public safety and will need to be carefully considered having regard to their frequency and the number of additional people that would be attracted to the premises. Applications will be expected to be supported by a travel plan and/or management plan where appropriate to address such issues.

Good design can help to mitigate noise and promote sustainable development. Good design can also ensure that places of worship respect the local context and character of an area and contribute to a high quality environment.



Birmingham City Council; Places of Worship and Faith-Related Community and Educational Uses SPD (May 2011):

[https://www.birmingham.gov.uk/directory\\_record/73724/places\\_of\\_worship](https://www.birmingham.gov.uk/directory_record/73724/places_of_worship)

Home Office; Fire safety risk assessment: small and medium places of assembly (2006): <https://www.gov.uk/government/publications/fire-safety-risk-assessment-small-and-medium-places-of-assembly>

Home Office; Fire safety risk assessment: large places of assembly (2006): <https://www.gov.uk/government/publications/fire-safety-risk-assessment-large-places-of-assembly>

Monitoring of planning applications for places of worship and faith related community uses (to be prepared)

## Policy DM9 Day Nurseries and Childcare Provision

Policy Content	Options Considered
<p>The Council's preferred locations for the development of day nurseries and facilities for the care, recreation and education of children are in the network of centres as defined in Policy TP21 of the Birmingham Development Plan. Proposals for development outside of the network of centres will only be considered favourably where:</p> <ol style="list-style-type: none"> <li>1. It is well served by means of walking, cycling and public transport;</li> <li>2. It will not have an unacceptable adverse impact on local amenity, parking public and highway safety;</li> <li>3. The site is appropriate for its purpose in its setting, suitable for the scale of the development and the number of children proposed; and</li> <li>4. Sufficient useable outdoor play space to meet the needs of the children is provided.</li> </ol>	<ul style="list-style-type: none"> <li>• Retain existing UDP policy</li> <li>• No policy</li> </ul>

SA Objective	No change	No policy	New policy	Commentary
ENV1 Encourage development that optimises the use of previously developed land and buildings	~	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+?	-?	+	Complementing wider development management policies which encourage high quality design, these policies will help to ensure that there is consistent application across the City for these particular uses.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+?	-?	++?	Consideration of the location of these uses should ensure that matters such as catchment areas are considered with attendant positive effects through travel reduction. The extent of the benefits is uncertain however, reflecting parental choice and wider catchment planning issues.
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~	~	~	No clear relationship

SA Objective	No change	No policy	New policy	Commentary
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	-	+	Provision of consistent policy on the location of such facilities will help to ensure that there is access for all, although the precise effects are uncertain.
ECON2 To help promote the vitality of local centres	+	-	+	Control of such uses should be of benefit to local centres, helping to produce balanced property uses which complement one another.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~	No clear relationship
ECON4 To encourage investment in learning and skills development	+	-	+	Provision of consistent policy on the location of such facilities will help to ensure that there is access for all, although the precise effects are uncertain.
SOC1 To help ensure equitable access to community services and facilities	+	-	+	Provision of consistent policy on the location of such facilities will help to ensure that there is access for all, although the precise effects are uncertain.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	+	-	+	Provision of consistent policy on the location of such facilities will help to ensure that there is access for all, although the precise effects are uncertain.

SA Objective	No change	No policy	New policy	Commentary
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	~	~	No clear relationship

### Commentary

A policy which ensures the consistent provision of day nurseries and facilities for the care, recreation and education of children across the City will help to ensure that there is equitable access (for example through sustainable locations) and in a fashion which maintains and enhances local amenity. The precise effects of the policy will have to be monitored to determine whether the policy objectives are being realised in practice. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address education-related development issues yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

### BCC Background - DM9 Day Nurseries and Childcare Provision:

Early years facilities bring benefits to the community by reducing barriers to work for parents and carers and can provide an environment conducive to the development of the children who attend. Investment in the expansion and improvement of educational facilities is supported, in accordance with the BDP (Policy TP36 Education). However, such facilities must be provided in appropriate locations and suitable premises to ensure high standards of provision and prevent harm to the amenity of neighbours.

The network of centres as defined by Policy TP21 of the Birmingham Development Plan is considered the most appropriate location, but locations outside of centres will be considered appropriate where the policy criteria are met. Where nurseries are proposed in residential areas it is important to ensure that they would not give rise to unacceptable adverse impacts on local amenity. In these cases it may be necessary to ensure that there is sufficient distance between buildings and/ or that mitigation measures will be put in place to minimise the impact from noise and disturbance.

The Council will expect all planning applications for day nurseries and child care facilities in residential buildings and other non-residential buildings to outline: the numbers of staff and other visitors expected to attend the facility; the days of the week and the hours when the facility will operate; the nature of the activity; car parking and transport patterns, including servicing of the use; disabled access; and steps taken to minimise the noise impact of such uses.

Birmingham City Council, Education Services Delivery and Improvement Plan 2017 – 2018

[https://www.birmingham.gov.uk/downloads/file/4340/education\\_services\\_delivery\\_and\\_improvement\\_plan\\_2016\\_to\\_2017\\_v20\\_26\\_may\\_2016](https://www.birmingham.gov.uk/downloads/file/4340/education_services_delivery_and_improvement_plan_2016_to_2017_v20_26_may_2016)

Birmingham City Council, Changing Times Report (2016)

[https://www.birmingham.gov.uk/downloads/download/925/changing\\_times\\_report](https://www.birmingham.gov.uk/downloads/download/925/changing_times_report)

Education Development Plan 2014-19 (2014) (pdf)

Monitoring of planning applications for day nurseries and childcare provision (to be prepared).

## Policy DM10 Standards for Residential Development

Policy Content	Options Considered
<ul style="list-style-type: none"> <li>All residential development will be required to meet the minimum Nationally Described Space Standards (Appendix 1).</li> <li>Proposals for major residential development, should seek to include a proportion of OR 7% on new affordable housing should be accessible and adaptable dwellings in accordance with Building Regulation Part M4 (2) unless demonstrated to be financially unviable.</li> <li>Separation distances* between buildings and surrounding uses should protect residents' privacy and outlook, ensure appropriate levels of daylight to internal and external living spaces and prevent undue enclosure, overshadowing, noise and disturbance.</li> <li>All new residential development must provide sufficient private useable outdoor amenity space appropriate to the scale, function and character of the development and adequate provision for recycling/ refuse storage and collection*.</li> <li>Development will need to ensure adequate outlook and daylight to dwellings, in line with the approach of the '45 degree Code'. This includes potential impacts on existing houses, where development should not cross the line from an angle of 45 degrees from the nearest window providing the main source of natural light to a 'habitable room' of dwellings that could be affected.</li> <li>Exceptions to the above will only be considered in order to deliver innovative high quality design, deal with exceptional site issues, respond to local character and where it can be demonstrated that residential amenity will not be significantly diminished.</li> </ul>	<ul style="list-style-type: none"> <li>Retain the existing UDP Policy</li> <li>No policy</li> </ul>
<p>* Standards are set out in the Birmingham Design Guide SPD.</p>	

SA Objective	Retain UDP Policy	No policy	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+?	-?	++?	Clear policies for residential design will help to ensure a consistent and progressive approach across the City.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	~	No clear relationship

SA Objective	Retain UDP Policy	No policy	New Policy	Commentary
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~	~	~	No clear relationship
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	-	++	A clear policy for residential amenity and design will help to ensure a consistent and progressive approach across the City, contributing to its economic success through the provision of high quality development.
ECON2 To help promote the vitality of local centres	+	-	++	Where residential development is encouraged in local centres, clear policy will help to ensure that it is part of good quality mixed uses.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~	No clear relationship
ECON4 To encourage investment in learning and skills development	~	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	~	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~	No clear relationship

SA Objective	Retain UDP Policy	No policy	New Policy	Commentary
SOC3 To encourage development which promotes health and well-being	+?	-?	++?	The policy will help to ensure that residential development of whatever kind is well-designed and constructed.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	~	~	No clear relationship

**Commentary**

This policy will yield a range of sustainability benefits, associated with ensuring that there is consistent high quality residential development throughout the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing a new policy to address residential design matters yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

**BCC Background - DM10 Standards for Residential Development:**

The Government’s Technical Housing Standards - Nationally Described Space Standards (March 2015 as updated) applies to new residential development in Birmingham. This will ensure that all homes are highly functional, meeting occupiers’ typical day to day needs at a given level of occupation. It is based on being able to accommodate a basic set of furniture, fittings, storage, activity and circulation space appropriate to the design and occupancy level of the dwelling. When Government amends these standards, the City Council will prepare technical notes to demonstrate how the update is applied within Birmingham.

All new development, including extensions of properties within residential areas, has the potential to affect adjoining dwellings. Daylight and outlook are important to create pleasant spaces and support everyday activities. The size and layout of windows in new residential development should be maximised and the layout and design of development must consider levels of sunlight reaching residential properties and take opportunities to benefit from passive solar gain whilst preventing overheating of indoor spaces.

The ‘45 Degree Code’ is a well-established approach in Birmingham to protect daylight levels and outlook for occupiers, particularly for existing houses. In applying the code the main considerations include:



- If the extension/building is single storey, the line is drawn from the midpoint of the nearest habitable room ground floor window of the adjoining premises.
- If the extension/building is two storey or taller, the measurement is taken from the quarter point of the nearest habitable room ground floor window.
- If the neighbouring property has already been extended, the measurement is normally taken from the nearest habitable room window of that extension. • If the neighbouring property has an extension which is made mainly of glass, the policy is applied to the original window opening in the wall where the extension has been added.

Outdoor private space is highly valued and it is important for both children and adults to have access to some private outdoor space for play and relaxation. The amount and type of outdoor space should relate to the potential occupancy of the dwelling and should be useable, with consideration from a number of factors, including shape, orientation, landform and shading. Outdoor amenity spaces should receive sunlight for at least part of the day, with garden sizes increased where necessary to take account of overshadowing. Existing guidance on outdoor amenity space and separation distances is set out in Places for Living SPD, which will be updated through the forthcoming Birmingham Design Guide SPD.

Across the UK as a whole, more people are living longer. Birmingham is following that national trend, and it is predicted that the percentage of those aged over 65 within the Birmingham will increase from 12.9% (145,865 people) to 16% (210,906 people) of the population. This represents a 58% increase to 2031 and a 45% increase to 2041 of people within this group. Despite increasing life expectancy, there remains a gap in healthy life expectancy. This in turn presents series of health and care challenges for older people and people with mobility impairments as it means they will be living longer with impairments and life-limiting conditions.

There will be a larger elderly population who will living longer and are likely to be living with disabilities in their later years. A requirement of 30% of new homes to meet the optional building regulation for accessible and adaptable homes is considered appropriate.

- Birmingham's older population makes up 12.9% of the total Birmingham population. Population forecasts show that this will increase to 16% in 2041. (ONS 2016 sub national population projections).
- The number of households headed by those aged 65+ has been increasing in Birmingham and is projected to increase to 28% of total households in the city.
- The Census 2011 shows that 18.4% of people currently report themselves as having a long term health problem or disability (being limited a little and a lot).
- Healthy life expectancy of men and women in Birmingham is much lower than the national average. The gap between healthy life expectancy and life expectancy indicates that the older population will therefore spend more years in poor health.
- In terms of those 65+, there is predicted to be 30.6% increase in people with a limiting long term illness whose day-to-day activities will be limited a little and 31.8% increase in people whose day-to-day activities will be limited a lot by 2035.

Birmingham City Council; 45 Degree Code for Residential Extensions (March 2006):

[https://www.birmingham.gov.uk/directory\\_record/669/45\\_degree\\_code\\_for\\_residential\\_extensions](https://www.birmingham.gov.uk/directory_record/669/45_degree_code_for_residential_extensions)

Department for Communities and Local Government; Technical Housing Standards – Nationally Described Space Standard (March 2015):

<https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

Ministry of Housing, Communities and Local Government; Access to and use of buildings: Approved Document M (2016):

<https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m>

Strategic Housing Land Availability Assessment (SHLAA) (2018)

Birmingham City Council, Standards for Residential Development Topic Paper (September 2019)

## Policy DM11 Houses in Multiple Occupation (HMO)

Policy Content	Options Considered
<p>Proposals for the conversion of existing dwellinghouses or the construction of new buildings to be used as Houses in Multiple Occupation (HMO) should protect the residential amenity and character of the area and will be permitted where they:</p> <ol style="list-style-type: none"> <li>a. would not result in this type of accommodation forming over 10% of the number of residential properties* within a 100 metre radius of the application site**; and</li> <li>b. would not result in a family dwellinghouse being sandwiched between two non-family residential uses***; and</li> <li>c. would not lead to a continuous frontage of three or more non-family residential uses***; and</li> <li>d. it would not result in the loss of an existing use that makes an important contribution to other Council objectives, strategies and policies; and</li> <li>e. would not give rise to unacceptable adverse cumulative impacts on amenity, character, appearance, highway safety and parking; and</li> <li>f. provide high quality accommodation with adequate living space including:             <ol style="list-style-type: none"> <li>g. bedrooms of at least 7.5 sq.m. (single) and 11.5 sq.m. (double); and</li> <li>h. communal living space comprising lounge, kitchen and dining space either as distinct rooms or in an open plan format; and</li> <li>i. washing facilities; and</li> <li>j. outdoor amenity space; and</li> <li>k. recycling/ refuse storage.</li> </ol> </li> </ol> <p>Where a) and c) has already been breached, planning permission will only be granted in exceptional circumstances****.</p> <p>Proposals for the intensification or expansion of an existing HMO should provide high quality accommodation in accordance with (e) and (f) above and have regard to the size and character of the property.</p> <p>* Paragraph 4.17 below sets out the residential properties identified for the purposes of calculating the percentage concentration of HMOs and the data sources for the purposes of identifying HMOs.</p> <p>** Measured from the centre point of the property</p> <p>*** For the purposes of this policy a non-family residential use is defined as a HMO, student accommodation, residential accommodation within C1 and C2 Use and self-contained flats.</p> <p>****Exceptional circumstances are set out in paragraph 4.18 below.</p>	<ul style="list-style-type: none"> <li>• Retain existing UDP policy</li> <li>• No policy</li> <li>• Less prescriptive policy</li> </ul>



SA Objective	Existing UDP policy	No policy	Less prescriptive Policy	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	+	-	+	++?	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	~	~	~	~	No clear relationship
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	~	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+	-	+	++?	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	~	~	No clear relationship
ECON2 To help promote the vitality of local centres	~	~	~	~	No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~	~	No clear relationship

SA Objective	Existing UDP policy	No policy	Less prescriptive Policy	New Policy	Commentary
ECON4 To encourage investment in learning and skills development	~	~	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	~	~	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	+	-	+	++?	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
SOC3 To encourage development which promotes health and well-being	~	~	~	~	No clear relationship
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	+	-	+	++?	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+	-	+	++?	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.

### Commentary

The sustainability effects of a clear policy which seeks to control HMOs is likely be positive, reflecting the potentially contentious issues associated with them. The sustainability effects principally relate to ensuring that local amenity and design quality is appropriately protected, whilst meeting demand and need. No likely significant negative effects have been identified although there is uncertainty relating to implementation, the outcomes of which will require monitoring. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

**BCC Background - DM11 Houses in Multiple Occupation (HMO):**

Public consultation was undertaken on the city-wide Article 4 Direction between 6 June and 18 July 2019. A total of 251 individual comments were received in response to the publicity period. 151 (60%) of these comments expressed support for the city-wide Article 4 Direction, 89 (36%) were opposed to it and 10 (4%) did not express a view. A petition was also received in support of the city-wide Article 4 Direction which was signed by 323 individuals. The main issues raised by those who support the city-wide direction are summarised as follows:

- Low levels of maintenance of HMO properties, resulting in poor quality living environments for occupants and neighbours;
- High amounts of litter and rubbish generated due to people occupying HMO properties;
- Noise generated from HMO properties;
- Incidences of crime and anti-social behaviour associated with some occupants of HMOs;
- Problems caused by parking and subsequent impacts on highway safety;
- Transient population and less community cohesion.

The main issues raised by those who object to the City-wide Direction are summarised as follows:

- The effect it will have on limiting the availability of different types of housing in the city;
- Knock-on effects that it will have on the affordability of housing and potential increases in homelessness as a result;
- That it will discriminate against students and younger age groups, who typically occupy such properties;
- That the case put forward to justify the Article 4 Direction was based on anecdotal and not factual evidence;
- That other mechanisms should be used instead to control the negative impacts associated with HMOs (e.g. Anti-Social Behaviour Orders and enforcing HMO Management Regulations)

More generally, concentrations of HMOs can impact upon residential amenity and can, in some cases, create particular issues with regard to:

- increased levels of crime and the fear of crime;
- poorer standards of property maintenance and repair;
- littering and accumulation of rubbish;
- noises between dwellings at all times and especially at night;
- decreased demand for some local services;

- increased parking pressures; and
- lack of community integration and less commitment to maintain the quality of the local environment.

Wider impacts on infrastructure and services created by a high concentration of HMOs and arising from the changing demography of the neighbourhood include:

- decline in owner occupied stock;
- increased population densities can place a strain on existing services, refuse disposal and street cleansing;
- reduction in demand for some local services;
- the decline of local school enrolment;
- underuse of community facilities; and
- increased demand for other services such as takeaway food, bars.

The BDP recognises that different types of residential accommodation are important to meeting the wide ranging housing needs of people in the City. All developments should achieve a high quality design contributing to a strong sense of place (BDP Policy PG3), and new homes should contribute towards achieving mixed and balanced communities (BDP policy TP30). The City Council will seek to prevent the loss to other uses of housing which is in good condition (BDP Policy TP35).

The conversion and reuse of existing buildings for housing can help to meet the changing housing on the surrounding area. Over-concentrations of certain types of accommodation can have a number of negative impacts on the local communities, including the loss of family housing, effects to the residential character, appearance, and amenity of an area as a result of excessive noise and disturbance to residents and levels of parking. The National HMO lobby and National Organisation of Residents Associations consider a 10% concentration of HMOs, equating to a 20-30% population as the tipping point to an unbalanced community. The Council's Strategic Housing Market Assessment (2013) identifies a need for market accommodation of all sizes but shows that the highest net change in the number of homes needed to 2031 is in the 3 and 4 or more bedroom category. A high proportion of 3 and 4 person households are also inadequately housed.

The cumulative effect of incremental intensification in an area caused by numerous changes of use from small HMO to large HMOs or the extension of existing HMOs can be also significant. In the right location, good design of development and its future operation can help to limit any negative impacts. This includes ensuring the proposal can be delivered in line with best practice and Government guidance, and setting residential institution developments within their own grounds.

Birmingham City Council; Planning Policy Document, Houses in Multiple Occupation in the Article 4 Direction Area of Selly Oak, Edgbaston & Harborne wards (Nov 2014) [https://www.birmingham.gov.uk/downloads/file/3232/planning\\_policy\\_document\\_final\\_17\\_november\\_2014](https://www.birmingham.gov.uk/downloads/file/3232/planning_policy_document_final_17_november_2014)

Birmingham City Council, Houses in Multiple Occupation Topic Paper (2019) (in draft)

Birmingham City Council, 45 Degree Code for Residential Extensions (March 2006):  
[https://www.birmingham.gov.uk/directory\\_record/669/45\\_degree\\_code\\_for\\_residential\\_extensions](https://www.birmingham.gov.uk/directory_record/669/45_degree_code_for_residential_extensions)

National HMO Lobby - Balanced Communities and Studentification (2008): <http://www.hmolobby.org.uk/lobbybalancedcomms.htm>

Planning Inspectorate; Appeal Decision APP/P4605/W/14/3001406 (23/03/2015): <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3001406>

Planning Inspectorate; Appeal Decision APP/P4605/W/15/3024057 (11/08/2015): <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3024057>

Strategic Housing Market Assessment (SHMA) (2013)

## Policy DM12 Residential Conversions and Specialist Accommodation

### Policy Content

This policy applies to the subdivision or conversion of properties into self-contained dwelling units and the development of specialist accommodation. Proposals will be supported where:

- a. high quality accommodation is provided that complies with Policy DM10 Standards for Residential Development and other relevant Local Plan policies; and
- b. it would not result in the loss of an existing use that makes an important contribution to other Council objectives, strategies and policies;
- c. it will not lead to an adverse impact on the amenity, character and appearance of the area, taking into account the cumulative effects of similar uses in the area;
- d. the accommodation and facilities, including provision for safety and security, is suitable for the intended occupiers; and
- e. they have good access to local shops, services, public transport and facilities appropriate to the needs of the intended occupiers.

### Options Considered

- No policy
- New policy

SA Objective	No policy	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	-	++?	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	~	++	Development will accord with design standards set out in policy DM10.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	-	++?	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	No clear relationship

SA Objective	No policy	New Policy	Commentary
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	No clear relationship
ECON2 To help promote the vitality of local centres	~	~	No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	No clear relationship
ECON4 To encourage investment in learning and skills development	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	-	++?	The policy is designed to meet the specific housing needs of sectors of the population.
SOC3 To encourage development which promotes health and well-being	~	++?	The policy is designed to meet the specific housing needs of sectors of the population.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	-	++?	A positive policy will assist with local decision making on appropriate accommodation for specific needs and sectors of the population.

## Commentary

Promoting the sensitive conversion of properties for specific needs is likely to result in significant positive effects through the provision of appropriate accommodation for those in particular need. The option of having no specific policy could result in some minor adverse effects relating to social indicators. In particular, no likely significant negative effects have been identified although there is uncertainty relating to implementation, the outcomes of which will require monitoring. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

### **BCC Background - DM12 Residential Conversions and Specialist Accommodation**

Specialist residential accommodation is a generic description used to describe housing that meets the needs of specific groups of people. This can comprise hostels, shared housing, care homes and supported accommodation for older people and people with mental health, learning disabilities, dementia, physical and sensory impairment, ex-offenders and drugs and alcohol dependency. It does not include age-restricted general market housing, retirement living or sheltered housing.

The Council's Strategic Housing Market Assessment (SHMA) (2013) indicates a need for market accommodation of all sizes it also shows that the highest net change in the number of homes needed to 2031 is in the 3 and 4 or more bedroom categories. Increasing the amount of general housing that is suitable for older and less able people (e.g. smaller homes, bungalows and serviced flats), together with more specialist housing, can have the added benefit of freeing up larger homes in communities that are required by families, of which there is a high level of demand for in Birmingham (SHMA 2013).

The recognition of the need and demand for specialist residential accommodation reflects a movement away from institutional care and studio accommodation into the provision of self-contained accommodation respecting individual choice and independence and offering the chance to remain integrated in the community. However, it is difficult to quantify the exact types of development, or numbers of bedspaces that will be required to meet hostel and other supported housing needs which arise as this can vary on a weekly basis.

There is a significant amount of older person's specialist housing in Birmingham at present, the majority of which is within the affordable sector. The vast majority of both the affordable and market supply is sheltered housing. There are relatively small amounts of other types of specialist older person's housing, and this is especially true for the Council's own stock.

The quality as well as the quantity of accommodation is crucial to the ongoing health and wellbeing of older people. While there is specialist housing that meets current best practice and design standards, other dwellings were developed or converted under historic standards and are now unable to meet the expectations of citizens. The conversion of a single dwelling house into several separate units may result in an increased intensity of use and possible adverse effects on the adjacent properties, including increased amount of traffic, on-street parking and poor waste management.

Birmingham City Council, Standards for Residential Development Topic Paper (September 2019)

## Policy DM13 Self and Custom Build Housing

Policy Content	Options Considered
<p>1. The Council will actively support the development of self and custom-build homes in suitable locations where they support the delivery of the Birmingham Development Plan and do not conflict with other policies in the Local Plan.</p> <p>2. The Council will encourage developers to consider whether an element of self-build plots can be incorporated into development schemes as part of the housing mix. The Council's self-build register will be used as a source of evidence of the demand for self-build and custom build housing locally, and the level of demand will be a material consideration in determining proposals.</p> <p>3. Affordable self-build plots will be considered and encouraged as a suitable product within the affordable housing requirement on larger sites.</p>	<ul style="list-style-type: none"> <li>No policy</li> </ul>

SA Objective	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	-?	+?	Self-build could be part of land and building re-use where traditional solutions have failed.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	-?	+?	A policy on self-build should encourage innovation in design standards.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~	~	No clear relationship
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	No clear relationship

SA Objective	No policy	New policy	Commentary
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	No clear relationship
ECON2 To help promote the vitality of local centres	~	~	No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	-?	+?	Self-build could be part of the wider solution to realising housing development in regeneration areas.
ECON4 To encourage investment in learning and skills development	-?	++?	Self-build can be the focus for individual training and skills development.
SOC1 To help ensure equitable access to community services and facilities	~	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	-?	++	A proactive approach to self-build should contribute to providing more diverse routes to housing provision which meet individual circumstances.
SOC3 To encourage development which promotes health and well-being	-?	+?	A proactive approach to self-build should contribute to realising individual ambitions and needs.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	-?	++?	A proactive approach to self-build should contribute to helping communities realise aspirations for more diverse housing delivery models.

## Commentary

Promoting self- and custom-build housing through a specific policy is likely to yield positive sustainability effects City-wide with no adverse effects identified. No likely significant negative effects have been identified although there is uncertainty relating to implementation, the outcomes of which will require monitoring. There are no suggested changes to the content of the policy arising from the appraisal. The option of having no specific policy could result in some minor adverse effects relating to social indicators. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

### **BCC Background - DM13 Self and Custom Build Housing:**

Councils are required to adopt a proactive and positive approach to encouraging and supporting self-build, in light of:

- The National Planning Policy Framework requires local planning authorities to clearly understand need, and plan for a mix of housing, including for people wishing to build their own homes.
- The Self-Build and Custom Housebuilding Act 2015 places a duty on local authorities to keep a register of those seeking to acquire a plot for self-building and to have regard to the register in carrying out their planning, housing, land disposal and regeneration functions.
- The Housing and Planning Act introduced a duty on local authorities to “give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority’s area arising in each base period”.

Birmingham City Council has been operating its self-build register since November 2014. The number of entries on the register at present is relatively low but increasing. The number of new homes granted exemptions from the Community Infrastructure Levy due to their self/custom build status also indicates that there is considerable self-build activity in the city. Applications for this type of housing will be judged against the same relevant policies in the Plan, particularly standards for residential development (DM10).

Self-build and Custom Housebuilding Act 2015 <https://www.legislation.gov.uk/ukpga/2015/17>

Birmingham City Council Self Build Register [https://www.birmingham.gov.uk/info/20054/planning\\_strategies\\_and\\_policies/1052/apply\\_to\\_be\\_on\\_the\\_self-build\\_and\\_custom\\_housebuilding\\_register](https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/1052/apply_to_be_on_the_self-build_and_custom_housebuilding_register)

Birmingham City Council, Standards for Residential Development Topic Paper (September 2019)

## Policy DM14 Highway Safety and Access

Policy Content	Options Considered
<ol style="list-style-type: none"> <li>1. Development must ensure that the safety of highway users is properly taken into consideration and that any new development would not have an adverse impact on highway safety.</li> <li>2. Development must ensure that safe, convenient and appropriate access arrangements are in place for all users, including the needs of people with disabilities and reduced mobility within the development and onto the highway network, both during the construction and operation stages of the development. Priority shall be given to the needs of sustainable transport modes.</li> <li>3. Developments should provide for the efficient delivery of goods and access by service and emergency service vehicles. Where it is demonstrated that this is not feasible, an appropriate alternative solution must be agreed with the City Council and secured.</li> <li>4. Development proposals that will generate significant amounts of traffic should be accompanied by a Transport Assessment and should be located where the need to travel will be minimised, and is in a location that is readily accessible by a variety of transport modes. Development proposals that generate significant amounts of traffic will be required to provide a Travel Plan that sets out the means by which the developer will encourage users to adopt more sustainable modes of travel.</li> <li>5. Vehicle access points (including private driveways) will be supported where it would not result in:               <ul style="list-style-type: none"> <li>• a reduction in pedestrian or highway safety;</li> <li>• detrimental impact on public transport, cycling and walking routes;</li> <li>• adverse impact on the quality of the street scene and local character of the area;</li> <li>• the loss of important landscape features, including street trees and significant areas of green verge; and</li> <li>• the prevention or restriction of the implementation of necessary or future transport improvements.</li> </ul> </li> <li>5. On Birmingham's strategic highway network, and other principle and main distributor routes, development must seek opportunities to remove unnecessary access points. New direct vehicular accesses will be supported where there are no practical alternatives (including consideration of impacts on public transport, walking and cycling routes). Any new access point must allow for access and egress in a forward gear.</li> </ol>	<ul style="list-style-type: none"> <li>• Retain the existing UDP Policy</li> <li>• No policy</li> </ul>

SA Objective	No change	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	-	+	Attention to the design of transport infrastructure complements that applied to other aspects of the built environment.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+	-	++	An efficient and effective transport system contributes enhancing sustainable travel, through the requirements for production of Travel Plans, for example.
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+	-	+	Attention to the design of transport infrastructure complements that applied to other aspects of the built environment.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	~	No clear relationship
ECON2 To help promote the vitality of local centres	+	-	++	An efficient and effective transport system contributes significantly to economic growth and thereby the well-being of residents through job opportunities.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~	No clear relationship

SA Objective	No change	No policy	New policy	Commentary
ECON4 To encourage investment in learning and skills development	~	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	+	-	+	An efficient and effective transport system enables access to services and facilities by residents.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	+	-	+	An efficient and effective transport system contributes significantly to economic growth and thereby the well-being of residents through job opportunities.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+	-	++	The policy could assist local neighbourhoods in realising greater control over highway-related issues.

### Commentary

Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect on enhancing the City's economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is enhanced through the greater opportunities for efficient travel within the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

**BCC Background - DM14 Highway Safety and Access:**

Highway Safety is fundamental to the design of the highway network and no development should have a negative impact on highway safety. Effective traffic management is essential to the safe and free flow of movement on the highway network. It can improve accessibility and potentially reduce congestion by understanding flows of traffic at peak and non-peak periods. This is to be secured through:

- Ensuring that development proposals that will generate significant amounts of traffic are accompanied by a Transport Assessment or Statement and will be required to provide a Travel Plan. Applications for development with significant transport implications should demonstrate the measures they are taking to minimise the impact of the development on highway users.
- Travel Plans which have measurable outputs, which might relate to targets in the local transport plan, and set out the arrangements for monitoring the progress of the plan, as well as the arrangements for enforcement, in the event that agreed objectives are not met.
- Travel Plans which include clear, viable proposals for monitoring of travel patterns post occupation.
- Consideration of the existing network and proposed access points to the site will need to be suitable for future traffic levels.
- Any new or amended access arrangements need to be carefully considered to ensure the efficient, effective and safe operation of the highway infrastructure across the City in view of the main parts of the highway network within Birmingham, including the strategic highway network and the West Midlands key route network, which are more sensitive to traffic impacts from development.

These measures complement the Road Safety Strategy for the City (2016) which is part of the Birmingham Connected vision for the future of transport in Birmingham, working towards a safer, healthier, greener city with a reliable integrated transport system which supports the City's growing population and economy, including through:

**Safer roads**

- Considering all road users and providing for the most vulnerable (pedestrians, cyclists, motorcyclists, 16 to 24 year-olds and children) when maintaining or making changes to our road network.
- Understanding where accidents are happening in the city and seeking to address problems.
- Addressing speeding by reducing speed limits and trialling digital speed cameras.

**Safer people**

- Providing education, training and campaigns on key road safety issues including walking, cycling, driver behaviour, motorcycle safety and large vehicle/HGV awareness.
- Targeting the delivery of road safety information to the people and places where it is most needed.

The emerging walking and cycling strategy for the City proposes a ten year plan to ensure that walking and cycling become popular choices for short journeys and for recreational activities and to increase opportunities for walking and cycling and reduce dependence on the motor car. Key objectives are to enable, develop and inspire walking and cycling, with proposals for a city-wide cycle route network and walking investment are set out in the Local Cycling and Walking Infrastructure Plan.

Birmingham City Council, Birmingham Connected (2014)

[https://www.birmingham.gov.uk/downloads/download/552/birmingham\\_connected](https://www.birmingham.gov.uk/downloads/download/552/birmingham_connected)

Birmingham City Council, Draft Birmingham Walking and Cycling Strategy and Infrastructure Plan (June 2019)

[https://www.birmingham.gov.uk/info/20013/roads\\_travel\\_and\\_parking/1942/walking\\_and\\_cycling\\_strategy\\_and\\_infrastructure\\_plan](https://www.birmingham.gov.uk/info/20013/roads_travel_and_parking/1942/walking_and_cycling_strategy_and_infrastructure_plan)

Birmingham City Council; A Road Safety Strategy for Birmingham (October 2016)

[https://www.birmingham.gov.uk/info/20163/safer\\_greener\\_healthier\\_travel/361/birmingham\\_road\\_safety\\_strategy](https://www.birmingham.gov.uk/info/20163/safer_greener_healthier_travel/361/birmingham_road_safety_strategy)

Birmingham City Council; Birmingham Connected Business Travel Network guidance

[https://www.birmingham.gov.uk/info/20013/roads\\_travel\\_and\\_parking/1020/business\\_travel\\_network](https://www.birmingham.gov.uk/info/20013/roads_travel_and_parking/1020/business_travel_network)

Birmingham City Council; STARSfor guidance [https://www.birmingham.gov.uk/info/20013/roads\\_travel\\_and\\_parking/1020/business\\_travel\\_network/2](https://www.birmingham.gov.uk/info/20013/roads_travel_and_parking/1020/business_travel_network/2)

CLG, DfT, Manual for Streets (2007)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/341513/pdfmanforstreets.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf)

## Policy DM15 Parking and Servicing

Policy Content	Options Considered
1. All development proposals will be required to follow the standards in the Parking SPD (and any subsequent revisions). This includes provision for people with disabilities, cycle parking and infrastructure to support the use of low emission vehicles.	<ul style="list-style-type: none"> <li>• Retain the existing UDP Policy</li> <li>• No policy</li> </ul>
2. Proposals for parking and servicing shall avoid highway safety problems and protect local amenity and character of the area.	
3. For development where no standards exist, parking shall be provided to ensure that the operational needs of the development are adequately met, having regard to the need to points above.	
4. Development should include transport infrastructure that improves equality of access to travel and supports the efficient use of space, such as cycle hire and car club schemes.	
5. Parking proposals should have regard to the Birmingham Design Guide and be designed to be fully accessible to all users.	
6. Proposals for standalone parking facilities must demonstrate that there is a deficit in local publicly available off-street parking, or that it will help to relieve on-street parking problems.	

SA Objective	No change	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+?	-?	+	Attention to the design of transport infrastructure complements that applied to other aspects of the built environment.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+?	-?	++?	An efficient and effective transport system contributes enhancing sustainable travel, through provision for cycle parking and infrastructure, for example.

SA Objective	No change	No policy	New policy	Commentary
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+	-	+	Attention to the design of transport infrastructure complements that applied to other aspects of the built environment.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	~	No clear relationship
ECON2 To help promote the vitality of local centres	+	-	++	Efficient and effective parking policy can have a significant effect on local centre viability.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~	No clear relationship
ECON4 To encourage investment in learning and skills development	~	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	+	-	+	An efficient and effective transport system enables access to services and facilities by residents.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~	No clear relationship

SA Objective	No change	No policy	New policy	Commentary
SOC3 To encourage development which promotes health and well-being	+?	-?	+	An efficient and effective transport system contributes significantly to economic growth and thereby the well-being of residents through job opportunities.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+?	-?	++	The policy could assist local neighbourhoods in realising greater control over highway-related issues.

**Commentary**

Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect of enhancing the City’s economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is enhanced through the greater opportunities for efficient travel within the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

**BCC Background - DM15 Parking and Servicing:**

Growth in the city’s population will result in 1.2million additional daily trips across the network by 2031 (by all transport modes). It is not possible or indeed desirable to accommodate all these by private car due to existing constraints on our highway capacity and because of the significant detrimental impact of traffic on our environment. Local parking policies, alongside other planning and transport measures, should act to promote sustainable transport choices and reduce reliance on the private car for work and other journeys. Careful and appropriate management of parking is a key element of Birmingham’s transport strategy. The Council is currently consulting on a new Parking Supplementary Planning Document (SPD). The approach to the provision of parking aims to promote sustainable transport, reduce congestion, improve road safety and reduce pollution. The Parking SPD will set out how the city will manage on-street (public highway) and off-street parking provision across the city. This will be through:

- Support for and promotion of the provision of charging points for ultra-low emission vehicles and car clubs which would contribute to sustainable development in the City.



- Accepting garages as contributing towards parking provision for development if they have adequate functional space, contributing to parking needs and residential amenity by creating a more secure environment, and reducing the potential for unsocial parking and visual impacts.
- Ensuring a design led approach is adopted to ensure parking functions satisfactorily for all users including disabled drivers, pedestrians, cyclists and service vehicles and does not impact negatively on the surrounding streetscape.
- Encouraging new hotel developments in locations where bike hire schemes are established to provide publicly accessible bike hire facilities on site in liaison with the city bike hire provider.

Birmingham City Council, Birmingham Connected (2014)

[https://www.birmingham.gov.uk/downloads/download/552/birmingham\\_connected](https://www.birmingham.gov.uk/downloads/download/552/birmingham_connected)

Birmingham City Council; Car Park Design Guide SPD (2012) [https://www.birmingham.gov.uk/directory\\_record/673/car\\_park\\_design\\_guide](https://www.birmingham.gov.uk/directory_record/673/car_park_design_guide)

Birmingham City Council; Car Parking Guidelines SPD (2012)

[https://www.birmingham.gov.uk/directory\\_record/646/car\\_parking\\_guidelines\\_supplementary\\_planning\\_document](https://www.birmingham.gov.uk/directory_record/646/car_parking_guidelines_supplementary_planning_document)

Birmingham City Council; Parking of Vehicles at Commercial and Industrial Premises Adjacent to Residential Property Guidance

[https://www.birmingham.gov.uk/directory\\_record/680/parking\\_of\\_vehicles\\_at\\_commercial\\_and\\_industrial\\_premises\\_adjacent\\_to\\_residential\\_property](https://www.birmingham.gov.uk/directory_record/680/parking_of_vehicles_at_commercial_and_industrial_premises_adjacent_to_residential_property)

Movement for Growth; West Midlands Strategic Transport Plan

<https://www.wmca.org.uk/what-we-do/transport/>

## Policy DM16 Telecommunications

Policy Content	Options Considered
----------------	--------------------

The Council will promote the development of advanced, high quality communications infrastructure to support economic growth and more accessible, inclusive communities. This will be achieved by requiring new development proposals to:

- Retain the existing UDP Policy
- No policy

- Demonstrate opportunities have been explored for sharing of masts or sites. Such evidence should accompany any application made to the local planning authority;
- Demonstrate that there are no suitable alternative sites for telecommunications development available in the locality including the erection of antennae on existing buildings or other suitable structures
- Be sited and designed in order to minimise impact on the visual and residential amenity, character and appearance of the surrounding areas;
- If on a building, apparatus and associated structures to be sited and designed in order to minimise impact to the external appearance of the building;
- Not have unacceptable harm on areas of ecological interest, areas of landscape importance, or heritage assets and their setting; and
- Conform to the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, taking account where appropriate of the cumulative impact of all operators' equipment located on the mast / site.

SA Objective	No change	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+?	-?	+	The policy should promote the efficient use of shared facilities, for example, and more widely help to realise good design.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+?	-?	+	Modern telecommunications infrastructure is an important part of helping to reduce the need to travel through home-working and teleconferencing, for example.



SA Objective	No change	No policy	New policy	Commentary
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+?	-?	+	Attention to the impacts on cultural and natural heritage will help to protect their interests.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+?	-?	+	Modern telecommunications infrastructure is an important part of promoting the City's economic performance.
ECON2 To help promote the vitality of local centres	+?	-?	+	Modern telecommunications infrastructure is an important part of promoting the City's economic performance.
ECON3 To promote the regeneration of areas across the City through appropriate development	+?	-?	+	Modern telecommunications infrastructure is an important part of promoting the City's economic performance.
ECON4 To encourage investment in learning and skills development	+?	-?	+	Modern telecommunications infrastructure is an important part of promoting the City's economic performance.
SOC1 To help ensure equitable access to community services and facilities	+?	-?	+	Modern telecommunications infrastructure is an important part of basic community services.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~	No clear relationship

SA Objective	No change	No policy	New policy	Commentary
SOC3 To encourage development which promotes health and well-being	+?	-?	+	Modern telecommunications infrastructure helps to develop economic performance, employment opportunities and thereby the well-being of residents.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+?	-?	+	Modern telecommunications infrastructure contributes to the development of advances in e-democracy.

**Commentary**

Ensuring that the City has an up-to-date telecommunications infrastructure will ensure sustainability benefits across a range of objectives, notably the contribution to the City’s economic performance, creating opportunities for travel reduction and ensuring that all residents have equitable access to high quality services that enable them to fulfil their economic and social potential. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address telecommunications siting matters yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

**BCC Background - DM16 Telecommunications:**

Evidence to justify the proposed development should support applications for telecommunications development and include:

- the outcome of consultations with organisations with an interest in the proposed development.
- a statement that self-certifies the cumulative exposure will not exceed the International Commission on non-ionising radiation protection guidelines is needed, or evidence that the applicant has explored the possibility for erecting antennas on an existing building, mast or other structure and a statement certifying International Commission guidelines will be met.
- consideration of the design which minimises the visual impact of the development which may relate to the form of structure, to colour and to material.
- ensuring that masts, as far as possible, blend in with the natural landscape. This includes the associated equipment such as underground cable, service routes and means of enclosure should be designed such that there is minimal loss or damage to trees and other natural vegetation.



Birmingham City Council; Telecommunications development mobile phone infrastructure SPD (March 2008)

[https://www.birmingham.gov.uk/directory\\_record/690/telecommunications\\_development\\_mobile\\_phone\\_infrastructure\\_supplementary\\_planning\\_document](https://www.birmingham.gov.uk/directory_record/690/telecommunications_development_mobile_phone_infrastructure_supplementary_planning_document)

Mobile UK; Code of Best Practice on Mobile Network Development in England (2016) <https://www.gov.uk/government/publications/code-of-best-practice-on-mobile-phone-network-development>

International Commission on Non-Ionizing Radiation Protection; Guidelines for Limiting Exposure to Non-Ionizing Radiation (1998)

<https://www.icnirp.org/en/publications/article/icnirp-publications-1992-2004.html>

West Midlands Local Industrial Strategy (2019)

<https://www.gov.uk/government/publications/west-midlands-local-industrial-strategy>

West Midlands Strategic Economic Plan

<https://www.wmca.org.uk/what-we-do/strategy/>



## Appendix B

# Review of Plans, Policies and Strategies and their use in the Sustainability Objectives

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
<b>International</b>		
Council of Europe (2006) European Landscape Convention	Aims to promote the protection, management and planning of Europe's landscapes, both rural and urban, and to foster European co-operation on landscape issues.	Incorporated in Sustainability Objective ENV4
Council of Europe (1985) Convention on the Protection of the Architectural Heritage of Europe	This convention commits signatories to protect their architectural heritage by means of identifying monuments, buildings and sites to be protected; preventing the disfigurement, dilapidation or demolition of protected properties; providing financial support by the public authorities for maintaining and restoring the architectural heritage on its territory; and supporting scientific research for identifying and analysing the harmful effects of pollution and for defining ways and means to reduce or eradicate these effects.	Incorporated in Sustainability Objective ENV4
EU (2007) Floods Directive	The Floods Directive aims to provide a consistent approach to managing flood risk across Europe. The approach is based on a 6 year cycle of planning which includes the publication of Preliminary Flood Risk Assessments, hazard and risk maps and flood risk management plans. The Directive is transposed into English law by the Flood Risk Regulations 2009.	Incorporated in Sustainability Objective ENV5
EU (1991) Urban Waste Water Treatment Directive.	The Directive aims to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors and concerns the collection, treatment and discharge of: <ul style="list-style-type: none"> <li>• Domestic Waste Water;</li> <li>• Mixture of Waste Water; and</li> <li>• Waste Water from Certain Industrial Sectors.</li> </ul> <p>There are four main principles: planning, regulation, monitoring, and information and reporting.</p>	Incorporated in Sustainability Objective ENV6
EC (2007) Together for Health: A Strategic Approach for the EU 2008-2013	The Strategy aims to provide an overarching strategic framework spanning core issues in health as well as health in all policies and global health issues.	Incorporated in Sustainability Objective SOC3
The Pan-European Biological and Landscape Diversity Strategy (1995)	The strategy aims to address degradation of biological and landscape diversity across Europe reinstating these assets where possible.	Incorporated in Sustainability Objective ENV4
EU Directive on the Conservation of Wild Birds (79/409/EEC)	Identifies 181 endangered species and sub-species for which the Member States are required to designate Special Protection Areas. <p>Makes it a legal requirement that EU countries make provision for the protection of birds. This includes the selection and designation of Special Protection Areas.</p> <p>Target Actions include:</p> <ul style="list-style-type: none"> <li>• Creation of protected areas;</li> <li>• Upkeep and management; and</li> <li>• Re-establishment of destroyed biotopes.</li> </ul>	Incorporated in Sustainability Objective ENV4.
EU Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora	Directive seeks to conserve natural habitats. Conservation of natural habitats requires member states to identify special areas of conservation and to maintain, where necessary landscape features of importance to wildlife and flora.	Incorporated in Sustainability Objective ENV4.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
(92/43/EEC) & Subsequent Amendments	<p>The amendments in 2007:</p> <ul style="list-style-type: none"> <li>• Simplify the species protection regime to better reflect the Habitats Directive;</li> <li>• Provide a clear legal basis for surveillance and monitoring of European protected species (EPS);</li> <li>• Toughen the regime on trading EPS that are not native to the UK; and</li> <li>• Ensure that the requirement to carry out appropriate assessments on water abstraction consents and land use plans is explicit.</li> </ul>	
EU Directive on Waste (Directive 75/442/EEC, 2006/12/EC 2008/98/EC as amended)	<p>Promotes the development of clean technology to process waste, promoting recycling and re-use.</p> <p>The Directive contains a range of provision including:</p> <ul style="list-style-type: none"> <li>• The setting up of separate collections of waste where technically, environmentally and economically practicable and appropriate to meet the necessary quality standards for the relevant recycling sectors – including by 2015 separate collection for at least paper, metal, plastic and glass.</li> <li>• Household waste recycling target – the preparing for re-use and the recycling of waste materials such as at least paper, metal, plastic and glass from households and possibly other origins as far as these waste streams are similar to waste from households, must be increased to a minimum of 50% by weight by 2020.</li> </ul> <p>Construction and demolition waste recovery target – the preparing for re-use, recycling and other material recovery of non-hazardous construction and demolition waste must be increased to a minimum of 70% by weight by 2020.</p>	Incorporated in Sustainability Objective ENV6.
EU Packaging and Packaging Waste Directive (94/62/EC)	<p>This Directive aims to harmonize national measures concerning the management of packaging and packaging waste in order, on the one hand, to prevent any impact thereof on the environment of all Member States as well as of third countries or to reduce such impact, thus providing a high level of environmental protection, and, on the other hand, to ensure the functioning of the internal market and to avoid obstacles to trade and distortion and restriction of competition within the Community.</p> <p>To this end this Directive lays down measures aimed, as a first priority, at preventing the production of packaging waste and, as additional fundamental principles, at reusing packaging, at recycling and other forms of recovering packaging waste and, hence, at reducing the final disposal of such waste.</p> <p>No later than five years from the date by which this Directive must be implemented in national law (1996), between 50 % as a minimum and 65 % as a maximum by weight of the packaging waste will be recovered.</p> <p>Within this general target, and with the same time limit, between 25 % as a minimum and 45 % as a maximum by weight of the totality of packaging materials contained in packaging waste will be recycled with a minimum of 15 % by weight for each packaging material.</p>	Incorporated in Sustainability Objective ENV6.
EU (1996) Ambient Air Quality Assessment and Management (96/62/EC, Air Quality Framework Directive).	<p>The Directive ensures that where pollutants exceed certain limit values, Member States take action to reduce pollution down to the limit values. The list of atmospheric pollutants to be considered includes: sulphur dioxide, nitrogen dioxide, particulate matter, lead, ozone, benzene, carbon monoxide, poly-aromatic hydrocarbons, cadmium, arsenic, nickel and mercury.</p> <p>Objectives:</p> <ul style="list-style-type: none"> <li>• Obtain adequate information on ambient air quality; and</li> <li>• Maintain ambient air quality where it is good and improve air quality where it is bad.</li> </ul>	Incorporated in Sustainability Objective ENV6
EU (1998) Aarhus Convention	<p>The Aarhus Convention establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective. The Convention provides for:</p> <ul style="list-style-type: none"> <li>• The right of everyone to receive environmental information that is held by public authorities ("access to environmental information"). This can include information on the state of the environment, but also on policies or measures taken, or on the state of human health and safety where this can be affected by the state of the environment. Applicants are entitled to obtain this information within one month of the request and without having to say why they require it. In addition, public authorities are obliged, under</li> </ul>	Incorporated in Sustainability Objective SOC5

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<p>the Convention, to actively disseminate environmental information in their possession;</p> <ul style="list-style-type: none"> <li>• The right to participate in environmental decision-making. Arrangements are to be made by public authorities to enable the public affected and environmental non-governmental organisations to comment on, for example, proposals for projects affecting the environment, or plans and programmes relating to the environment, these comments to be taken into due account in decision-making, and information to be provided on the final decisions and the reasons for it ("public participation in environmental decision-making");</li> <li>• The right to review procedures to challenge public decisions that have been made without respecting the two aforementioned rights or environmental law in general ("access to justice").</li> </ul>	
EU Drinking Water Directive (98/83/EC)	Provides for the quality of drinking water. The standards are legally binding.	Incorporated in Sustainability Objective ENV6.
EU Directive on the Landfill of Waste (99/31/EC)	Sets out requirements to ensuring that where landfilling takes place the environmental impacts are understood and mitigated against. By 2006 biodegradable municipal waste going to landfills must be reduced to 75% of the total amount (by weight) of biodegradable municipal waste produced in 1995 or the latest year before 1995 for which standardised Eurostat data is available.	Incorporated in Sustainability Objective ENV6.
EU (2000) Directive on Establishing a Framework for Community Action in the Field of Water Policy (2000/60/EC, The Water Framework Directive).	<p>The Directive establishes an integrated approach to protection, improvements and sustainable use of water bodies, introducing a statutory system of analysis and planning based upon the river basin.</p> <p>The Directive imposes a statutory responsibility on Member States to ensure all water bodies meet certain water quality standards. The four main stages of implementation are:</p> <ul style="list-style-type: none"> <li>• Environmental and economic assessment ('Characterisation') of river basin districts including identification of pressures and impacts;</li> <li>• Environmental monitoring based on river basin district characterisation;</li> <li>• Setting of environmental objectives; and</li> <li>• Designing and carrying out a programme of measures to achieve these environmental objectives.</li> </ul> <p>Targets: All water bodies in all Member States are to reach 'Good Ecological Status' by 2015. Good ecological status applies to natural water bodies and is defined as a slight variation from undisturbed natural conditions. Some water bodies are designated as 'artificial' or 'heavily modified'. This is because they may have been created or modified for a particular use such as water supply, flood protection, navigation or urban infrastructure. By definition, artificial and heavily modified water bodies are not able to achieve natural conditions. Instead the classification and objectives for these water bodies, and the biology they represent, are measured against 'ecological potential' rather than status. For an artificial or heavily modified water body to achieve good ecological potential, its chemistry must be good. In addition, any modifications to the structural or physical nature of the water body that harm biology must only be those essential for its valid use. All other such modifications must have been altered or managed to reduce or remove their adverse impact, so that there is the potential for biology to be as close as possible to that of a similar natural water body.</p>	Incorporated in Sustainability Objectives ENV5 and ENV6
EU 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (SEA Directive)	<p>The SEA Directive provides the following requirements for consultation:</p> <ul style="list-style-type: none"> <li>• Authorities which, because of their environmental responsibilities, are likely to be concerned with the effects of implementing the plan or programme, must be consulted on the scope and level of detail of the information to be included in the Environmental Report. These authorities are designated in the SEA Regulations as the Consultation Bodies (Consultation Authorities in Scotland).</li> <li>• The public and the Consultation Bodies must be consulted on the draft plan or programme and the Environmental Report, and must be given an early and effective opportunity within appropriate time frames to express their opinions.</li> </ul>	Directive sets the basis for SEA as a whole and therefore Indirectly covers all objectives.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<ul style="list-style-type: none"> <li>Other EU Member States must be consulted if the plan or programme is likely to have significant effects on the environment in their territories.</li> </ul>	
EU (2005) Clean Air Strategy.	The strategy aims to extend clean air laws into new sectors - agriculture and transport - that were not covered before, targeting five main pollutants including fine-dust particles which are most harmful to human health.	Incorporated in Sustainability Objective ENV6
EU (2010) The Industrial Emissions Directive	<p>The Johannesburg Declaration on Sustainable Development was adopted at the World Summit on Sustainable Development (WSSD), sometimes referred to as Earth Summit 2002, at which the Plan of Implementation of the World Summit on Sustainable Development was also agreed upon.</p> <p>The Johannesburg Declaration builds on earlier declarations made at the United Nations Conference on the Human Environment at Stockholm in 1972, and the Earth Summit in Rio de Janeiro in 1992. While committing the nations of the world to sustainable development, it also includes substantial mention of multilateralism as the path forward.</p> <p>In terms of the political commitment of parties, the Declaration is a more general statement than the Rio Declaration. It is an agreement to focus particularly on <i>"the worldwide conditions that pose severe threats to the sustainable development of our people, which include: chronic hunger; malnutrition; foreign occupation; armed conflict; illicit drug problems; organized crime; corruption; natural disasters; illicit arms trafficking; trafficking in persons; terrorism; intolerance and incitement to racial, ethnic, religious and other hatreds; xenophobia; and endemic, communicable and chronic diseases, in particular HIV/AIDS, malaria and tuberculosis."</i> Johannesburg Declaration</p>	The principles of sustainable development are included in all of the sustainability objectives.
UNFCCC (1997) Kyoto Protocol to the UN Framework Convention on Climate Change.	The protocol shares the Convention's objective (to achieve stabilisation of greenhouse gas concentrations in the atmosphere at safe levels, so that ecosystems can adapt naturally, and food supply is not threatened) but strengthens the convention by committing Countries to legally-binding targets to limit or reduce their greenhouse gas emissions.	Incorporated in Sustainability Objective ENV5
UNFCCC (2009) Copenhagen Accord (Climate Change).	<p>The Copenhagen Accord is a treaty that is to take over from the Kyoto Protocol's targets, as of when it expires in 2012, for curbing the growth in greenhouse gas emissions sufficiently to avoid climate change impacts projected by the IPCC. The Copenhagen Accord commits Countries to legally binding targets including:</p> <ul style="list-style-type: none"> <li>To reduce global emissions so as to hold the increase in global temperature below 2°C;</li> <li>Commit developed countries to reducing greenhouse gas emissions;</li> <li>Projects to reduce greenhouse gas emissions in developing countries will be subject to international monitoring if they are internationally funded;</li> <li>Provide developing countries with financial incentives to preserve forests; and</li> <li>Implementation of the Accord to be reviewed in 2015 and an assessment to be made on whether the goal of keeping global temperature rise within 2°C needs to be strengthened to 1.5°C.</li> </ul>	Incorporated in Sustainability Objective ENV5
<b>National</b>		
National Planning Policy Framework (NPPF) (2019)	<p>The 2012 NPPF was the adopted NPPF at the outset of the plan making process. The NPPF was updated in 2018 and the revised NPPF was updated in February 2019. Key points from the updated document are summarised under the sub-headings below.</p> <p>Section 2 of the NPPF states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <ol style="list-style-type: none"> <li>an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and</li> </ol>	



Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<ul style="list-style-type: none"> <li>• Minimising impacts on and providing net gains in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;</li> <li>• Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;</li> <li>• Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.</li> <li>• Plans and decisions should encourage effective use of brownfield sites and take into account the economic benefits of agricultural land when assessing development, seeking to utilise areas of poorer quality land.</li> </ul> <p>The NPPF includes strong protections for valued landscapes and townscapes as well as recognising the intrinsic character and beauty of the countryside. Planning policies and decisions are expected to be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. The Framework states (at paragraph 130) that: <i>“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions”</i>.</p> <p>The Framework has a number of specific requirements relating to planning and landscape including a clear expectation that the planning system should contribute to, and enhance, the natural and local environment by protecting and enhancing valued landscapes. Local planning authorities are expected to set criteria based policies against which proposals for any development on or affecting protected landscape areas will be judged. In doing so, distinctions should be made between the hierarchy of international, national and locally designated sites and <i>“great weight”</i> should be given to <i>“conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”</i>. It is also expected that the scale of development in these areas will be limited, with planning permission refused for major developments <i>“other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest”</i> (paragraph 172).</p> <p><b>Historic Environment:</b></p> <ul style="list-style-type: none"> <li>• One of the NPPF’s core planning principles for plan and decision making is conserving and enhancing the historic environment.</li> <li>• Local planning authorities are required to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.</li> <li>• The desirability of sustaining and enhancing the significance of the heritage assets, and putting them to viable uses consistent with their conservation;</li> <li>• The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;</li> <li>• The desirability of new development making a positive contribution to local character and distinctiveness; and</li> <li>• Opportunities to draw on the contribution made by the historic environment to the character of a place.</li> </ul> <p>Paragraph 188 of the NPPF states that Local Planning Authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.</p>	<p>Incorporated in Sustainability Objective ENV4</p>

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<p>Paragraph 194 of the NPPF identifies that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.</p> <p><b>Water:</b></p> <p>Among the NPPF's core principles are '<i>conserving and enhancing the natural environment</i>' and '<i>meeting the challenge of climate change, flooding and coastal change</i>'; In fulfilling these objectives, the planning system should contribute to and enhance the natural and local environment by: preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.</p> <p>In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment.</p> <p>Strategic Policies should make sufficient provision for water supply and wastewater.</p> <p>Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations.</p> <p>Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (where existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid where possible flood risk to people and property and manage any residual risk by:</p> <ul style="list-style-type: none"> <li>• applying the Sequential Test;</li> <li>• if necessary, applying the Exception Test;</li> <li>• safeguarding land from development that is required, or likely to be required for current or future flood management;</li> <li>• using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and</li> <li>• Where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.</li> </ul> <p><b>Climate Change:</b></p> <p>One of the core principles of the NPPF is meeting the challenge of climate change, flooding and coastal change and encourages the adoption of proactive strategies to mitigate and adapt to climate change in line with the objectives and provisions of the Climate Change Act 2008, taking full consideration of flood risk, coastal change and water supply and demand. The NPPF also supports low carbon future by helping to increase the use of renewable and low carbon sources in line with the National Policy Statement for Renewable Energy Infrastructure It seeks to ensure that all types of flood risk are taken into account over the long term at the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk.</p> <p>Plans are expected to take a proactive approach to mitigating and adapting to climate change in light of its long term implications including changes to flood risk and water supply. New development should both avoid increased</p>	<p>Incorporated in Sustainability Objectives ENV5 and ENV6</p> <p>Incorporated in Sustainability Objective ENV5</p>

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<p>vulnerability to the range of impacts arising from climate change and help to reduce greenhouse gas emissions, such as through its location, orientation and design.</p> <p>To help increase the use and supply of renewable and low carbon energy and heat, plans should:</p> <ul style="list-style-type: none"> <li>• Provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);</li> <li>• Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and</li> <li>• Identify opportunities for development to draw its energy supply from decentralized, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.</li> </ul> <p><b>Air Quality:</b></p> <p>Planning policies and decisions should sustain and contribute towards compliance with relevant limits or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified.</p> <p><b>Mineral and Waste:</b></p> <p>One of the core principles of the NPPF is facilitating the sustainable use of minerals. Policy guidance suggests the need to: Identify policies for the extraction of mineral resources of local and national importance, but not identify new sites or extensions to existing sites for peat extraction; so far as practicable take account of contribution secondary and recycled materials and minerals waste would make to the supply of materials before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously; the definition of Mineral Safeguarding Areas so that locations of mineral sources are not sterilised by other developments; set out policies to encourage the prior extraction of minerals, where practicable and environmentally feasible, if it is necessary for non-mineral development to take place; safeguarding of existing and planned mineral infrastructure (rail links, wharfage, storage, processing etc), environmental criteria to ensure there is not an unacceptable environmental impact; when developing noise limits, recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction; and policies for reclaiming land and site aftercare.</p> <p>Minerals planning authorities are expected to provide for the extraction of mineral resources of local and national importance and safeguard mineral resources by defining Mineral Safeguarding Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development. The NPPF defines '<i>mineral resources of local and national importance</i>' as minerals which are necessary to meet society's needs, including aggregates, brickclay, silica sand, cement raw materials, gypsum, salt, fluorspar, coal, oil and gas (including conventional and unconventional hydrocarbons) tungsten, kaolin, ball clay, potash, polyhalite and local minerals of importance to heritage assets and local distinctiveness.</p> <p><b>Economy:</b></p> <p>One of the NPPF's core planning principles for plan and decision making is building a strong competitive economy. The NPPF highlights the Government's commitment to securing economic growth to create jobs and prosperity, ensuring the planning system does everything it can to support sustainable economic growth.</p>	<p>Incorporated in Sustainability Objective ENV6</p> <p>Incorporated in Sustainability Objective ENV1</p> <p>Incorporated in Sustainability Objectives ECON1 – ECON4</p>

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<p>Local planning authorities are required to proactively meet development needs recognising potential barriers to invest (including infrastructure, housing and services) and regularly review land allocations. Economic growth in rural areas should be supported to create jobs and sustainable new developments, including expansion of all types of businesses, diversification of agriculture, supporting tourism and retention of local services.</p> <p>In drawing up local plans, local authorities should;</p> <ul style="list-style-type: none"> <li>• Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;</li> <li>• Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;</li> <li>• Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing or a poor environment; and</li> <li>• Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.</li> </ul> <p>Planning policies should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p> <p>Planning policies should support a prosperous rural economy and should enable:</p> <ul style="list-style-type: none"> <li>• The sustainable growth of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;</li> <li>• The development and diversification of agricultural and other land-based rural business;</li> <li>• Sustainable rural tourism and leisure developments which respect the character of the countryside; and</li> <li>• The retention and development of accessible local services and community facilities.</li> </ul> <p><b>Housing:</b></p> <p>To determine the minimum number of homes needed strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.</p> <p>Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:</p> <ul style="list-style-type: none"> <li>• Off-site provision or an appropriate financial contribution in lieu can be robustly justified; and</li> <li>• The agreed approach contributes to the objective of creating mixed and balanced communities.</li> </ul> <p>For major developments involving the provision of housing, planning policies should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area.</p> <p>Strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified</p>	<p>Incorporated in Sustainability Objective SOC2</p>

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<p>housing ended (and any needs that cannot be met within neighbouring areas) can be met over the plan period.</p> <p>Planning policies should identify a supply of:</p> <ul style="list-style-type: none"> <li>• Specific, deliverable sites for years 1-5 of plan period; and</li> <li>• Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.</li> </ul> <p>Strategic policy making authorities should identify suitable locations for large scale housing development.</p> <p>Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement.</p> <p>In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.</p> <p>Planning policies should avoid the development of isolated homes in the countryside except in special circumstances.</p> <p><b>Healthy and Safe Communities:</b></p> <p>Amongst the planning principles of the NPPF is the promotion of healthy and safe communities.</p> <p>Planning policies should:</p> <ul style="list-style-type: none"> <li>• Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other;</li> <li>• Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion;</li> <li>• Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.</li> </ul> <p>To provide the social, recreational and cultural facilities and services the community needs, planning policies should:</p> <ul style="list-style-type: none"> <li>• Plan positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments;</li> <li>• Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;</li> <li>• Guard against the unnecessary loss of valued facilities and services;</li> <li>• Ensure established shops, facilities and services are able to develop and modernize, and are retained for benefit of the community; and</li> <li>• Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.</li> </ul> <p><b>Open Space and Recreation:</b></p> <p>The framework sets out open space, sport and recreation considerations for neighbourhood planning bodies which include an assessment of needs and opportunities. Information gained from the assessments should be used to determine what open space, sport and recreation provision is needed, which plans should then seek to accommodate.</p> <p><b>Transport &amp; Accessibility:</b></p> <p>Amongst the planning principles of the NPPF are:</p> <ul style="list-style-type: none"> <li>• Promoting sustainable transport.</li> </ul>	<p>Incorporated in Sustainability Objective SOC3</p> <p>Incorporated in Sustainability Objectives SOC2 – SOC5</p> <p>Incorporated in Sustainability Objective ENV3</p>

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<p>Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <ul style="list-style-type: none"> <li>• The potential impacts of development on transport networks can be addressed;</li> <li>• Opportunities from existing or proposed transport infrastructure, and changing transport and usage are realized;</li> <li>• Opportunities to promote walking, cycling and public transport use are identified and pursued;</li> <li>• The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and</li> <li>• Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.</li> </ul> <p>Planning policies should:</p> <ul style="list-style-type: none"> <li>• Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;</li> <li>• Be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;</li> <li>• Identify and protect, where there is robust evidence, sites and routes which could be crucial in developing infrastructure to widen transport choice and realise opportunities for large scale development;</li> <li>• Provide for high quality walking and cycling networks and supporting facilities such as cycle parking;</li> <li>• Provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy; and</li> <li>• Recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time.</li> </ul> <p>Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.</p>	
DCLG (2011) The Localism Act	<p>The Localism Bill includes five key measures that underpin the Government's approach to decentralisation.</p> <ul style="list-style-type: none"> <li>• Community rights;</li> <li>• Neighbourhood planning;</li> <li>• Housing;</li> <li>• General power of competence; and</li> <li>• Empowering cities and other local areas.</li> </ul>	Incorporated in Sustainability Objectives SOC1 - SOC5
DCLG (2011) The Community Infrastructure Levy Regulations	<p>The Community Infrastructure Levy is a new levy that local authorities in England and Wales can choose to charge on new developments in their area. The money can be used to support development by funding infrastructure that the council, local community and neighbourhoods want - for example new or safer road schemes, park improvements or a new health centre. The system applies to most new buildings and charges are based on the size and type of the new development.</p>	Incorporated in Sustainability Objectives 11 - 15
DCLG (2014) Planning Policy for Traveller Sites (updated August 2015)	<p>This document sets out the Government's planning policy for Traveller sites. It identifies the following aims:</p> <ul style="list-style-type: none"> <li>• That local planning authorities should make their own assessment of need for the purposes of planning;</li> </ul>	Incorporated in Sustainability Objective SOC2.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<ul style="list-style-type: none"> <li>• To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;</li> <li>• To encourage local planning authorities to plan for sites over a reasonable timescale;</li> <li>• That plan-making and decision-taking should protect Green Belt from inappropriate development;</li> <li>• To promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites;</li> <li>• That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective;</li> <li>• For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies;</li> <li>• To increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply;</li> <li>• To reduce tensions between settled and Traveller communities in plan making and planning decisions;</li> <li>• To enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure; and</li> <li>• For local planning authorities to have due regard to the protection of local amenity and local environment.</li> </ul>	
DCLG (2019) Planning Practice Guidance	Planning Practice Guidance is designed to support the NPPF. It reflects the objectives of the NPPF which are not repeated here.	All of the Objectives reflect NPPF and PPG.
DCLG (2014) National Planning Policy for Waste	<p>This document sets out detailed waste planning policies for local authorities. States that planning authorities need to:</p> <ul style="list-style-type: none"> <li>• Use a proportionate evidence base in preparing Local Plans.</li> <li>• Identify sufficient opportunities to meet the identified needs of their area for the management of waste streams.</li> <li>• Identify suitable sites and areas.</li> </ul> <p>The overall objective of the document is to work towards a more sustainable and efficient approach to resource use and management. Planning plays a pivotal role e.g. by ensuring the design and layout of new development and other infrastructure complements sustainable waste management.</p>	Incorporated in Sustainability Objective ENV6
DCLG (2014) Written Statement on Sustainable Drainage Systems	This statement sets out that it is the Government's expectation that sustainable drainage systems will be provided in new developments wherever this is appropriate.	Incorporated in Sustainability Objective ENV6.
DCLG (2017) Fixing Our Broken Housing Market	<p>The White Paper makes the following proposals as 'step 1':</p> <ul style="list-style-type: none"> <li>• Making sure every part of the country has an up-to-date, sufficiently ambitious plan so that local communities decide where development should go;</li> <li>• Simplifying plan-making and making it more transparent, so it's easier for communities to produce plans and easier for developers to follow them;</li> <li>• Ensuring that plans start from an honest assessment of the need for new homes, and that local authorities work with their neighbours, so that difficult decisions are not ducked;</li> <li>• Clarifying what land is available for new housing, through greater transparency over who owns land and the options held on it;</li> <li>• Making more land available for homes in the right places, by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements;</li> <li>• Maintaining existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements;</li> <li>• Giving communities a stronger voice in the design of new housing to drive up the quality and character of new development, building on the success of neighbourhood planning; and</li> </ul>	Incorporated in Sustainability Objective SOC2.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<ul style="list-style-type: none"> <li>• Making better use of land for housing by encouraging higher densities, where appropriate, such as in urban locations where there is high housing demand; and by reviewing space standards.</li> </ul>	
DECC (2008) UK Climate Change Act 2008.	<p>The 2008 Climate Change Act seeks to manage and respond to climate change in the UK, by:</p> <ul style="list-style-type: none"> <li>• Setting ambitious, legally binding targets;</li> <li>• Taking powers to help meet those targets;</li> <li>• Strengthening the institutional framework;</li> <li>• Enhancing the UK's ability to adapt to the impact of climate change; and</li> <li>• Establishing clear and regular accountability to the UK Parliament and to the devolved legislatures.</li> </ul>	Incorporated in Sustainability Objective ENV5
DCMS (2007) Heritage Protection for the 21 <sup>st</sup> Century.	<p>This White Paper responds to the public call for change, and to this changing policy context. It sets out a vision for a new heritage protection system. The proposals in the White Paper reflect the importance of the heritage protection system in preserving heritage for people to enjoy now and in the future. They are based around three core principles:</p> <ul style="list-style-type: none"> <li>• Developing a unified approach to the historic environment;</li> <li>• Maximising opportunities for inclusion and involvement; and</li> <li>• Supporting sustainable communities by putting the historic environment at the heart of an effective planning system.</li> </ul>	Incorporated in Sustainability Objective ENV4
DCMS (2013) <i>Scheduled Monuments &amp; Nationally Important but Non-Scheduled Monuments</i>	<p>This policy statement sets out Government policy on the identification, protection, conservation and investigation of nationally important ancient monuments, under the provisions of the Ancient Monuments and Archaeological Areas Act 1979. It includes principles relating to the selection of scheduled monuments and the determination of applications for scheduled monument consent.</p>	Incorporated in Sustainability Objective 4.
DCMS (2016) The Culture White Paper	<p>The White Paper is structured around four core themes:</p> <ul style="list-style-type: none"> <li>• Everyone should enjoy the opportunities culture offers, no matter where they start in life;</li> <li>• The riches of our culture should benefit communities across the country;</li> <li>• The power of culture can increase our international standing; and</li> <li>• Cultural investment, resilience and reform.</li> </ul>	Incorporated in Sustainability Objective ENV4
DCMS (2017) Heritage Statement	<p>This statement sets out how the government will support the heritage sector and help it to protect and care for our heritage and historic environment in the coming years.</p> <p>There are no formal targets or objectives in this statement.</p>	Incorporated in Sustainability Objective ENV4
Defra (2007) Guidance for Local Authorities on Implementing Biodiversity Duty	<p>The Duty is set out in Section 40 of the Natural Environment and Rural Communities Act (NERC) 2006, and states that: "<i>Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity</i>". Particular areas of focus include: Policy, Strategy and Procurement; Management of Public Land and Buildings; Planning, Infrastructure and Development; and Education, Advice and Awareness.</p>	Incorporated in S Sustainability Objective ENV4
Defra (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (Volume 2).	<p>The Strategy sets out standards and objectives for the 8 main health-threatening air pollutants in the UK. The standards are based on an assessment of the effects of each pollutant on public health. They are based on recommendations by the Expert Panel on Air Quality Standards, The European Union Air Quality Daughter Directive and the World Health Organisation. Local Authorities are responsible for seven of the eight air pollutants under Local Air Quality Management (LAQM). National objectives have also been set for the eighth pollutant, ozone, as well as for nitrogen oxides and sulphur dioxide.</p>	Incorporated in Sustainability Objective ENV6
Defra (2007) The Air Quality Strategy for	<p>The Strategy:</p> <ul style="list-style-type: none"> <li>• Sets out a way forward for work and planning on air quality issues;</li> <li>• Sets out the air quality standards and objectives to be achieved;</li> </ul>	Incorporated in Sustainability

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
England, Scotland, Wales and Northern Ireland	<ul style="list-style-type: none"> <li>Introduces a new policy framework for tackling fine particles; and</li> <li>Identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives.</li> </ul> <p>The Air Quality Strategy sets out objectives for a range of pollutants. As these are quite extensive they have not been reproduced here.</p>	Objectives ENV3 and SOC2.
Defra (2007) Strategy for England's Trees, Woods and Forests	<p>Key aims for government intervention in trees, woods and forests are:</p> <ul style="list-style-type: none"> <li>To secure trees and woodlands for future generations;</li> <li>To ensure resilience to climate change;</li> <li>To protect and enhance natural resources;</li> <li>To increase the contribution that trees, woods and forests make to our quality of life; and</li> <li>To improve the competitiveness of woodland businesses and products.</li> </ul> <p>These aims will form the basis on which the Delivery plan will be developed by Natural England and the Forestry Commission England (FCE). The strategy provides a national policy direction, which can be incorporated alongside regional priorities within regional forestry frameworks.</p> <p>Strategy aims to create 2,200 hectares of wet woodland in England by 2010.</p>	Incorporated in Sustainability Objective ENV4.
Defra (2008) Future Water, the Government's Water Strategy for England	<p>Objectives: By 2030 at the latest, we have:</p> <ul style="list-style-type: none"> <li>Improved the quality of our water environment and the ecology which it supports, and continued to provide high levels of drinking water quality from our taps;</li> <li>Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water;</li> <li>Ensured a sustainable use of water resources, and implemented fair, affordable and cost reflective water charges;</li> <li>Cut greenhouse gas emissions; and</li> <li>Embedded continuous adaptation to climate change and other pressures across the water industry and water users.</li> </ul> <p>Targets: Key targets are within the objectives above and further a number of sub-targets are included within the document.</p>	Incorporated in Sustainability Objectives ENV5 and ENV6
Defra (2009) Safeguarding our Soils: A Strategy for England	<p>The Soil Strategy for England provides a vision to guide future policy development across a range of areas and sets out the practical steps that are needed to take to prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve understanding of the threats to soil and best practice in responding to them. The Strategy is underpinned by the following vision:</p> <p>By 2030, all England's soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations.</p> <p>Achieving this vision will mean that:</p> <ul style="list-style-type: none"> <li>Agricultural soils will be better managed and threats to them will be addressed;</li> <li>Soils will play a greater role in the fight against climate change and in helping us to manage its impacts;</li> <li>Soils in urban areas will be valued during development, and construction practices will ensure vital soil functions can be maintained; and</li> </ul> <p>Pollution of our soils is prevented, and our historic legacy of contaminated land is being dealt with.</p> <p>Key objectives of the strategy include:</p> <ul style="list-style-type: none"> <li>Better protection for agricultural soils;</li> <li>Protecting and enhancing stores of soil carbon;</li> <li>Building the resilience of soils to a changing climate;</li> <li>Preventing soil pollution;</li> </ul>	Incorporated in Sustainability Objective ENV4.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<ul style="list-style-type: none"> <li>• Effective soil protection during construction and development; and</li> <li>• Dealing with the legacy of contaminated land.</li> </ul>	
Defra (2011) Natural Environment White Paper; The natural choice: securing the value of nature	<p>The Natural Environment White paper sets out the Government's plans to ensure the natural environment is protected and fully integrated into society and economic growth. The White Paper sets out four key aims:</p> <ul style="list-style-type: none"> <li>(i) protecting and improving our natural environment;</li> <li>(ii) growing a green economy;</li> <li>(iii) reconnecting people and nature; and</li> <li>(iv) international and EU leadership, specifically to achieve environmentally and socially sustainable economic growth, together with food, water, climate and energy security and to put the EU on a path towards environmentally sustainable, low-carbon and resource-efficient growth, which is resilient to climate change, provides jobs and supports the wellbeing of citizens.</li> </ul>	Incorporated in Sustainability Objectives ENV4 and ECON1
Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem	<p>This biodiversity strategy for England that builds on the Natural Environment White Paper and provides a comprehensive picture of the Government is implementing the international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea. The Strategy has as its mission to halt overall biodiversity loss, support healthy well-functioning ecosystems, and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people. The Strategy is designed to help to deliver the Natural Environment White Paper and includes the following priorities:</p> <ul style="list-style-type: none"> <li>• Creating 200,000 hectares of new wildlife habitats by 2020;</li> <li>• Securing 50% of SSSIs in favourable condition, while maintaining at least 95% in favourable or recovering condition;</li> <li>• Encouraging more people to get involved in conservation by supporting wildlife gardening and outdoor learning programmes; and</li> <li>• Introducing a new designation for local green spaces to enable communities to protect places that are important to them.</li> </ul>	Incorporated in Sustainability Objective ENV4
Defra (2011) Review of Waste Policy in England	<p>Building on waste reduction targets established in the 2007 Waste Strategy, the Review sets out a range of commitments relating to:</p> <ul style="list-style-type: none"> <li>• Sustainable use of materials;</li> <li>• Waste prevention, re-use and recycling;</li> <li>• Regulation and enforcement;</li> <li>• Householders and local authorities working together;</li> <li>• Business waste collection;</li> <li>• Energy recovery;</li> <li>• Landfill; and</li> <li>• Infrastructure and planning.</li> </ul>	Incorporated in Sustainability Objective ENV2
Defra & HM Government (2011) Water White Paper; Water for Life	<p>Water for Life describes a vision for future water management in which the water sector is resilient, in which water companies are more efficient and customer focused, and in which water is valued as the precious and finite resource it is.</p>	Incorporated in Sustainability Objective ENV5
Defra & Environment Agency (2001) National Flood and Coastal Erosion Risk	<p>The strategy describes what needs to be done by all organisations involved in flood and coastal erosion risk management. The strategy sets out a statutory framework that will help communities, the public sector and other organisations to work together to manage flood and coastal erosion risk.</p>	Incorporated in Sustainability Objective ENV5

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
Management Strategy for England		
DfT (2008) Delivering a Sustainable Transport System (DaSTS).	<p>Objectives:</p> <ul style="list-style-type: none"> <li>• To support national economic competitiveness and growth, by delivering reliable and efficient transport networks;</li> <li>• To reduce transport's emissions of carbon dioxide and other greenhouse gases, with the desired outcome of tackling climate change;</li> <li>• To contribute to better safety and health and longer life-expectancy by reducing the risk of death, injury or illness arising from transport and by promoting travel modes that are beneficial to health;</li> <li>• To promote greater equality of opportunity for all citizens, with the desired outcome of achieving a fairer society; and</li> <li>• To improve quality of life for transport users and non-transport users, and to promote a healthy natural environment.</li> </ul>	I Incorporated in Sustainability Objectives ENV3, ECON1 – 3, SOC3
English Heritage (2008) Conservation Principles, Policies and Guidance	<p>A framework for the sustainable management of the historic environment based on the following principles:</p> <ul style="list-style-type: none"> <li>• The historic environment is a shared resource;</li> <li>• Everyone should be able to participate in sustaining the historic environment;</li> <li>• Understanding the significance of places is vital;</li> <li>• Significant places should be managed to sustain their values;</li> <li>• Decisions about change must be reasonable, transparent and consistent; and</li> <li>• Documenting and learning from decisions is essential.</li> </ul>	Incorporated in Sustainability Objective ENV3
English Nature (2006) Climate Change Space for Nature	Context for the next 80 years in terms of the likely effects of climate change on biodiversity. Prescribes suggested actions to be taken in preparation for change.	Incorporated in Sustainability Objective ENV3 and ENV5
Environment Agency (2009) Water for people and the environment - Water resources strategy for England and Wales.	<p>Objectives:</p> <ul style="list-style-type: none"> <li>• Enable habitats and species to adapt better to climate change;</li> <li>• Allow the way we protect the water environment to adjust flexibly to a changing climate;</li> <li>• Reduce pressure on the environment caused by water taken for human use;</li> <li>• Encourage options resilient to climate change to be chosen in the face of uncertainty;</li> <li>• Better protect vital water supply infrastructure;</li> <li>• Reduce greenhouse gas emissions from people using water, considering the whole life-cycle of use; and</li> <li>• Improve understanding of the risks and uncertainties of climate change.</li> </ul> <p>Target: In England, the average amount of water used per person in the home is reduced to 130 litres each day by 2030.</p>	Incorporated in Sustainability Objective ENV3 and ENV6
Environment Agency (2011) The National Flood and Coastal Erosion Risk Management Strategy for England	<p>The strategy encourages more effective risk management by enabling people, communities, businesses, infrastructure operators and the public sector to work together to:</p> <ul style="list-style-type: none"> <li>• Ensure a clear understanding of the risks of flooding and coastal erosion, nationally and locally, so investment risk can be prioritised more effectively;</li> <li>• Set out clear and consistent plans for risk management so that communities and business can make informed decisions about the management of the remaining risk;</li> <li>• Manage flood and coastal erosion risks in an appropriate way, taking account of the needs of communities and the environment;</li> </ul>	Incorporated in Sustainability Objective ENV5.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<ul style="list-style-type: none"> <li>Ensure that emergency plans and responses to flood incidents are effective and that communities are able to respond effectively to flood forecasts, warnings and advice; and</li> <li>Help communities to recover more quickly and effectively after incidents.</li> </ul>	
Forestry Commission (2005): Trees and Woodlands Nature's Health Service	An advisory document which provides detailed examples of how the Woodland Sector (trees, woodlands and green spaces) can significantly contribute to people's health, well-being (physical, psychological and social) and quality of life. Increasing levels of physical activity is a particular priority.	Incorporated in Sustainability Objective ENV4 and SOC3
HM Government (1979) Ancient Monuments and Archaeological Areas Act	The Act defines sites that warrant protection as ancient monuments. They can be a Scheduled Ancient Monuments or <i>"any other monument which in the opinion of the Secretary of State is of public interest by reason of the historic, architectural, traditional, artistic or archaeological interest attaching to it"</i> .  There are no specific targets or objectives identified.	Incorporated in Sustainability Objective ENV4.
HM Government (1981) Wildlife and Countryside Act	The main UK legislation relating to the protection of named animal and plant species includes legislation relating to the UK network of nationally protected wildlife areas: Site of Special Scientific Interest (SSSIs).  There are no specific targets or objectives identified.	Incorporated in Sustainability Objective ENV4.
HM Government (1990) Planning (Listed Building and Conservation Areas) Act	The Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest.  There are no specific targets or objectives identified.	Incorporated in Sustainability Objective ENV4.
HM Government (2000) Countryside and Rights of Way Act 2000	This Act: <ul style="list-style-type: none"> <li>Gives people greater freedom to explore open country on foot;</li> <li>Creates a duty for Highway Authorities and National Park Authorities to establish Local Access Forums;</li> <li>Provides a cut-off date of 1 January 2026 for the recording of certain rights of way on definitive maps and the extinguishment of those not so recorded by that date;</li> <li>Offers greater protection to wildlife and natural features, better protection for Sites of Special Scientific Interest (SSSIs) and more effective enforcement of wildlife legislation; and</li> <li>Protects Areas of Outstanding Natural Beauty with legislation similar to that for National Parks.</li> </ul> There are no specific objectives or targets in the Act.	Incorporated in Sustainability Objective ENV4.
HM Government (2003) Sustainable Energy Act	The Act aims to promote sustainable energy development and use and report on progress regarding cutting the UK's carbon emissions and reducing the number of people living in fuel poverty.  Specific targets are set by the Secretary of State as energy efficiency aims.	Incorporated in Sustainability Objective ENV4.
HM Government (2003) The Water Environment (Water Framework Directive) (England and Wales) Regulations	Requires all inland and coastal waters to reach "good status" by 2015. This is being done by establishing a river basin structure with ecological targets for surface waters.	Incorporated in Sustainability Objective ENV6
HM Government (2004 and revised 2006) Housing Act	Energy efficiency must be at least 20% greater in properties by 2010 than compared with 2000.	Incorporated in Sustainability Objective ENV4.
HM Government (2005) Securing the Future – the UK Sustainable Development Strategy	The Strategy contains a new set of indicators to monitor progress towards sustainable development in the UK. Those most relevant at the local authority level include: <ul style="list-style-type: none"> <li>Greenhouse gas emissions</li> <li>Road freight (CO2 emissions and tonne km, tonnes and GDP)</li> <li>Household waste (a) arisings (b) recycled or composted</li> <li>Local environmental quality</li> </ul>	Incorporated in Sustainability Objectives ENV1 - 4, and ENV6.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
<p>HM Government (2006) The Natural Environment and Rural Communities Act 2006</p>	<p>The Act is primarily intended to implement key aspects of the Government's Rural Strategy published in July 2004; it also addresses a wider range of issues relating broadly to the natural environment.</p> <p>The Act established an independent body – Natural England – responsible for conserving, enhancing and managing England's natural environment for the benefit of current and future generations.</p> <p>The Act also established the Commission for Rural Communities ("the Commission"). The Commission will be an independent advocate, watchdog and expert adviser for rural England, with a particular focus on people suffering from social disadvantage and areas suffering from economic under-performance. It will provide information, advice, monitoring and reporting to Government and others on issues and policies affecting rural needs.</p> <p>The Act also reconstitutes the Joint Nature Conservation Committee and renames and reconstitutes the Inland Waterways Amenity Advisory Council (which becomes the Inland Waterways Advisory Council).</p> <p>In line with the 2004 Rural Strategy, the Act extends both the Secretary of State's funding powers for functions within Defra's remit, and the ability to authorise other bodies to carry out those functions. Public bodies for which Defra is responsible are given the power to enter agreements to enable various other designated bodies to perform functions on their behalf. These various powers are intended to be used to simplify and devolve delivery arrangements and to improve their effectiveness and efficiency.</p> <p>The Act makes provision in respect of biodiversity, pesticides harmful to wildlife and the protection of birds, and in respect of invasive non-native species. It alters enforcement powers in connection with wildlife protection, and extends time limits for prosecuting certain wildlife offences. It addresses a small number of gaps and uncertainties which have been identified in relation to the law on sites of special scientific interest. It amends the functions and constitution of National Park authorities, the functions of the Broads Authority and the law on rights of way.</p>	<p>Incorporated in Sustainability Objectives ENV4, ECON1 - 3</p>
<p>HM Government (2006) The Natural Environment and Rural Communities (NERC) Act 2006</p>	<p>The Act:</p> <ul style="list-style-type: none"> <li>• Makes provision about bodies concerned with the natural environment and rural communities;</li> <li>• Makes provision in connection with wildlife, Sites of Special Scientific Interest (SSSIs), National Parks and the Broads;</li> <li>• Amends the law relating to rights of way;</li> <li>• Makes provision as to the Inland Waterways Amenity Advisory Council; and</li> <li>• Provides for flexible administrative arrangements in connection with functions relating to the environment and rural affairs and certain other functions; and for connected purposes.</li> </ul> <p>There are no specific objectives or targets in the Act.</p>	<p>Incorporated in Sustainability Objective 4.</p>
<p>HM Government (2008) The Climate Change Act 2008</p>	<p>The Act sets:</p> <ul style="list-style-type: none"> <li>• Legally binding targets - greenhouse gas emission reductions through action in the UK and abroad of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline. The 2020 target will be reviewed soon after Royal Assent to reflect the move to all greenhouse gases and the increase in the 2050 target to 80%.</li> </ul> <p>Further, the Act provides for a carbon budgeting system which caps emissions over five year periods, with three budgets set at a time, to set out our trajectory to 2050.</p>	<p>Incorporated in Sustainability Objective ENV5.</p>
<p>HM Government (2008) The Planning Act</p>	<p>Introduces a new system for nationally significant infrastructure planning, alongside further reforms to the Town and Country Planning system. A major component of this legislation is the introduction of an independent Infrastructure Planning Commission (IPC), to take decisions on major infrastructure projects (transport, energy, water and waste). To support decision-making, the IPC will refer to the Government's National Policy Statements (NPSs), which will provide a clear long-term strategic direction for nationally significant infrastructure development.</p> <p>There are no specific objectives or targets in the Act.</p>	<p>This act is not specifically relevant to any of the objectives.</p>

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
HM Government (2009) The UK Renewable Energy Strategy	<p>A vision is set out in the document whereby by 2020:</p> <ul style="list-style-type: none"> <li>• More than 30% of our electricity is generated from renewables;</li> <li>• 12% of our heat is generated from renewables; and</li> <li>• 10% of transport energy is generated from renewables.</li> </ul>	Incorporated in Sustainability Objective ENV5.
HM Government (2010) The Government's Statement on the Historic Environment for England	<p>The Vision of the Statement is <i>"that the value of the historic environment is recognised by all who have the power to shape it; that Government gives it proper recognition and that it is managed intelligently and in a way that fully realises its contribution to the economic, social and cultural life of the nation."</i></p> <p>This vision is supported by six aims:</p> <ol style="list-style-type: none"> <li>1 Strategic Leadership: Ensure that relevant policy, guidance, and standards across Government emphasize our responsibility to manage England's historic environment for present and future generations.</li> <li>2 Protective Framework: Ensure that all heritage assets are afforded an appropriate and effective level of protection, while allowing, where appropriate, for well managed and intelligent change.</li> <li>3 Local Capacity: Encourage structures, skills and systems at a local level which: promote early consideration of the historic environment; ensure that local decision makers have access to the expertise they need; and provide sufficiently skilled people to execute proposed changes to heritage assets sensitively and sympathetically.</li> <li>4 Public Involvement: Promote opportunities to place people and communities at the centre of the designation and management of their local historic environment and to make use of heritage as a focus for learning and community identity at all levels.</li> <li>5 Direct Ownership: Ensure all heritage assets in public ownership meet appropriate standards of care and use while allowing, where appropriate, for well managed and intelligent change.</li> <li>6 Sustainable Future: Seek to promote the role of the historic environment within the Government's response to climate change and as part of its sustainable development agenda.</li> </ol> <p>No key targets.</p>	Incorporated in Sustainability Objective ENV4
HM Government (2010) The Air Quality Standards 2010	The Regulations largely implement Directive 2008/50/EC on ambient air quality and cleaner air for Europe.	Incorporated in Sustainability Objective ENV6
HM Government (2010) Flood and Water Management Act	<p>The Act takes forward a number of recommendations from the Pitt Review into the 2007 floods and places new responsibilities on the Environment Agency, local authorities and property developers (among others) to manage the risk of flooding.</p> <ul style="list-style-type: none"> <li>• The Environment Agency is responsible for developing and applying a flood risk management strategy for England and Wales. Every other agency with a flood risk management function across England and Wales must take account of this strategy.</li> <li>• Local authorities across England and Wales are required to develop, maintain, apply and monitor a strategy for local flood risk management in their areas. These local strategies must include the risk of flooding from surface water, watercourse and groundwater flooding.</li> <li>• Lead local authorities must establish and maintain a register of structures which have an effect on flood risk management in their areas.</li> <li>• The Act introduces a requirement to improve the flood resistance of existing buildings by amending the Building Act 1984.</li> <li>• The Act introduces the provision for residential landlords to be charged the cost of their tenant's unpaid water bills should the landlord fail to pass on the tenants details to the respective water company for the local area.</li> <li>• The Act introduces the requirements for developers of property to construct Sustainable Drainage Systems (SUDS).</li> <li>• Local authorities have a duty to adopt these SUDS once completed. By adoption, the Act means that they become responsible for maintaining the systems.</li> </ul>	Incorporated in Sustainability Objective ENV5

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<p>Those key targets related to water resources, include:</p> <ul style="list-style-type: none"> <li>To widen the list of uses of water that water companies can control during periods of water shortage, and enable Government to add to and remove uses from the list.</li> <li>To encourage the uptake of sustainable drainage systems by removing the automatic right to connect to sewers and providing for unitary and county councils to adopt SUDS for new developments and redevelopments.</li> <li>To reduce 'bad debt' in the water industry by amending the Water Industry Act 1991 to provide a named customer and clarify who is responsible for paying the water bill.</li> </ul> <p>To make it easier for water and sewerage companies to develop and implement social tariffs where companies consider there is a good cause to do so, and in light of guidance that will be issued by the Secretary of State following a full public consultation.</p>	
HM Government (2010) White Paper: Healthy Lives, Healthy People: Strategy for Public Health in England	<p>Aims to create a 'wellness' service (Public Health for England) and to strengthen both national and local leadership.</p> <p>No formal targets or objectives.</p>	Incorporated in Sustainability Objective SOC3.
HM Government (2011) The Localism Act	<p>The Localism Bill includes five key measures that underpin the Government's approach to decentralisation.</p> <ul style="list-style-type: none"> <li>Community rights;</li> <li>Neighbourhood planning;</li> <li>Housing;</li> <li>General power of competence; and</li> <li>Empowering cities and other local areas.</li> </ul> <p>No key targets or indicators.</p>	Incorporated in Sustainability Objective SOC5.
HM Government (2011) Water for Life: White Paper	<p><i>Water for Life</i> describes a vision for future water management in which the water sector is resilient, in which water companies are more efficient and customer focused, and in which water is valued as the precious and finite resource it is.</p> <p><i>Water for Life</i> includes several proposals for deregulating and simplifying legislation, to reduce burdens on business and stimulate growth. Ofwat's proposals for reducing its regulatory burdens complement these.</p> <p>No key targets or objectives.</p>	Incorporated in Sustainability Objective ENV6.
HM Government (2011) Carbon Plan: Delivering our Low Carbon Future	<p>This sets out how the UK will achieve decarbonisation within the framework of energy policy:</p> <ul style="list-style-type: none"> <li>To make the transition to a low carbon economy while maintaining energy security, and minimising costs to consumers, particularly those in poorer households.</li> </ul> <p>There are no formal objectives or targets.</p>	Incorporated in Sustainability Objective ENV5.
HM Government (2013) The Community Infrastructure Levy (Amendment) Regulations 2013	<p>The Community Infrastructure Level (CIL) is a charge which may be applied to new developments by local authorities. The money can be used to support development by funding infrastructure that the council, local community and neighbourhoods want.</p> <p>There are no formal objectives or targets.</p>	Not specifically applicable to any of the objectives.
HM Government (2014) Water Act 2014	<p>The provisions in the Act enable the delivery of Government's aims for a sustainable sector as set out in the Water White Paper in a way that this is workable and clear. This Act aims to makes steps towards reducing regulatory burdens, promoting innovation and investment, giving choice and better service to customers and enabling more efficient use of scarce water resources.</p> <p>There are no formal objectives or targets.</p>	Incorporated in Sustainability Objective ENV6.
HM Government (2015) Water Framework Directive (Standards and Classification) Directions	<p>The regulations implement provisions of the Water Framework Directive (Directive 2000/60/EC), the Environmental Quality Standards Directive (Directive 2008/105/EC) and the priority substances amendment of these directives (Directive 2013/39/EU). This includes directions for the classification</p>	Incorporated in Sustainability Objective ENV6.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
(England and Wales) 2015.	of surface water and groundwater bodies, monitoring requirements, standards for ecological and chemical status of surface waters, and environmental quality standards for priority substances.  There are no formal objectives or targets.	
HM Government (2015) Government Response to the Committee on Climate Change.	In June 2015 the Committee on Climate Change and the Adaptation Sub-Committee published the seventh progress report on Government's mitigation activity and the first statutory assessment of the National Adaptation Programme. This included five recommendations and it is those recommendations that are responded to within this response.  There are no formal objectives or targets.	Incorporated in Sustainability Objective ENV5.
HM Government (2016) Environmental Permitting (England and Wales) Regulations 2016.	The Regulations provide a consolidated system of environmental permitting in England and Wales, and transpose the provisions of 15 EU Directives. It provides a system for environmental permits and exemptions for industrial activities, mobile plant, waste operations, mining waste operations, water discharge activities, groundwater activities, flood risk activities and radioactive substances activities. It also sets out the powers, functions and duties of the regulators.  Certain flood risk activities are now regulated under the Environmental Permitting Regulations, with environmental permits required for some activities. There are slight variations between England and Wales.  There are no formal objectives or targets.	Not specifically relevant to any of the objectives.
HM Government (2016) Housing and Planning Act 2016	This Act makes widespread changes to housing policy and the planning system. It introduces legislation to allow the sale of higher value local authority homes, introduce starter homes and "Pay to Stay" and other measures intended to promote home ownership and boost levels of housebuilding.  The Act introduces numerous changes to housing law and planning law: <ul style="list-style-type: none"> <li>• A proposal to abolish secure and assured tenancies for new tenancies, and replace them with fixed term tenancies lasting between two and five years. However, following an amendment, this was later extended to tenancies of up to 10 years with the possibility of for longer tenancies for families with children.[3] The Act requires where there is a succession to the tenancy that unless they are a spouse or civil partner the new tenancy has to be fixed term rather than secure. Housing associations are not affected by this change.</li> <li>• The promotion of self-build and custom build housebuilding.</li> <li>• The building of 200,000 starter homes which will be obtainable to first time buyers between 23 and 40 for sale at 20% below market prices.</li> <li>• The extension of right to buy to include housing association properties. Due to a deal with the National Housing Federation right to buy will be extended to housing association tenants on a voluntary basis with the Government making payments to housing associations to compensate for the discounts on offer.</li> <li>• A policy dubbed "pay to stay" that would see some council tenants pay higher rent. Income of £31,000 or £40,000 in London would see someone hit by "Pay to Stay". Tenants in receipt of housing benefit would not be affected by this change and neither would housing association tenants.</li> <li>• The forced sale of high value empty local authority properties. The stated aim of this policy was to fund right-to-buy for housing associations in order to promote home ownership. The Act states that lost social housing will be replaced with "affordable housing" which could be a starter home. In London two properties will be built for every one sold.</li> <li>• The speeding up of the planning system so as to deliver more housing. A concept called "permission in principle" is being introduced which is "an automatic consent for sites identified in local plans and new brownfield registers subject to further technical details being agreed by authorities". It is hoped that this will speed up house building.</li> <li>• Powers to force local authorities to have a Local Plan where they do not have one.</li> <li>• Changes to banning orders on "rogue landlords" The Act allows a local authority to apply for a banning order when a landlord or letting agent</li> </ul>	Incorporated in Sustainability Objective SOC2.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<p>commits certain offences. The Act also creates a database of rogue landlords that will be maintained by local authorities.</p> <ul style="list-style-type: none"> <li>• Changes relating to Rent Repayment Orders allowing a local authority to apply for one where a landlord has committed certain offences.</li> <li>• A law allowing recovery of abandoned properties. A private landlord will be allowed to do this without serving a section 21 notice and without serving a court order.</li> </ul>	
HM Government (2017) The Conservation of Habitats and Species Regulations 2017	<p>The Conservation of Habitats and Species Regulations 2017 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales. The Regulations place a duty on the Secretary of State to propose a list of sites which are important for either habitats or species (listed in Annexes I and II of the Habitats Directive respectively) to the European Commission. Once the Commission and EU Member States have agreed that the sites submitted are worthy of designation, they are identified as Sites of Community Importance (SCIs).</p>	Incorporated in Sustainability Objective ENV4.
HM Government (2006) Climate Change The UK Programme	<p>The Climate Change Programme aims to tackle climate change by setting out policies and priorities for action in the UK and internationally.</p> <p>Aims and Objectives:</p> <ul style="list-style-type: none"> <li>• To reduce carbon dioxide emissions by 20% below 1990 levels by 2010 (more than is required by the Kyoto Agreement);</li> <li>• Make agreements with other countries as to how they will tackle climate change together;</li> <li>• Report annually to Parliament on UK emissions, future plans and progress on domestic climate change; and</li> <li>• Set out the adaptation plan for the UK, informed by additional research on the impacts of climate change.</li> </ul>	Incorporated in Sustainability Objective ENV5
<b>Regional</b>		
Sewern Trent Water Resources Management Plan (2019)	<p>Guidance on the approach to water management over the period 2020-2025, focused on achieving and maintaining the level of headroom necessary to ensure we can deliver our target levels of service at least cost to customers, whilst minimizing the impact on the environment. WRMP we forecast a significant deficit will develop between supply and demand for water over the medium term unless we act. One key difference from our previous plans is the need to prevent the risk of future environmental deterioration, which is a fundamental requirement of the Water Framework Directive. This means that, in order to protect our environment for future customers, some of our current sources of water cannot be relied upon in the future and we need to find alternative ways of meeting demand.</p> <p>Our plan aims to respond to this, and other strategic challenges, and ensure that we:</p> <ul style="list-style-type: none"> <li>• Preserve our current level of resilience against droughts;</li> <li>• Tackle unsustainable abstraction and prevent future environmental deterioration;</li> <li>• Appropriately plan for climate change;</li> <li>• Meet future population growth;</li> <li>• Improve the resilience of customers' supplies;</li> <li>• Meet our customers' and stakeholders' needs and expectations;</li> <li>• Meet our wider regulatory obligations; and</li> <li>• Understand and allow for future uncertainty.</li> </ul>	Incorporated in Sustainability Objectives ENV2 and ENV5
Energy Capital (2018) a Regional Approach to Clean Energy Innovation	<p>The report states the main focus of the (Energy Improvement Zones) EIZs will be to integrate low carbon technologies, to develop the business models and infrastructure needed to support new approaches to clean energy as well as overcome the regulatory barriers necessary for them to flourish. They will be</p>	Incorporated in sustainability objective ENV5.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<p>designed to stimulate local clean energy innovation and drive productivity within the region, exports and growth.</p> <p>The EIZs aim to demonstrate new technologies, and to turn them into fully commercial propositions, breeding regional markets and supply chains that provide a platform for exports and growth. They will also offer a controlled environment in which innovators of all types can trial new services, technologies and business models.</p>	
Environment Agency Humber River Basin Management Plan (2015)	<p>A strategic document summaries key issue by river catchment. For the Tame, Anker and Mease these are to:</p> <ul style="list-style-type: none"> <li>• Improve sewage treatment works at a number of locations to reduce the levels of phosphate, for the River Trent designation.</li> <li>• Target pollution prevention campaigns around industrial areas in the urban areas, particularly around Birmingham and the Black Country.</li> <li>• Improve sewage treatment works at a number of locations in the River Mease catchment to reduce the levels of phosphate in the SAC site.</li> </ul>	Incorporated in Sustainability Objectives ENV5 and ENV6
Environment Agency The Tame, Anker and Mease Management Catchment (2017)	<p>Catchment Vision</p> <p>Our catchment has a sustainable and diverse water environment that is valued for the benefits it brings to people, the economy of the region and the natural environment. It has improved resilience to climate change, flooding and pollution events, and is in good ecological condition. People from many sectors and disciplines across the catchment are committed to caring for the catchment by working together, and using innovation, to capitalise on the opportunities presented and solutions to the challenges faced.</p> <p>Catchment Objectives</p> <ul style="list-style-type: none"> <li>• To promote the value of rivers, streams and wetlands and to increase their natural capacity to ameliorate the impacts of flooding and pollution.</li> <li>• To create a more sustainable and diverse water environment that is a valued asset for the economy, people and the natural environment</li> <li>• To work with local stakeholders to harness their support and enthusiasm to address the opportunities and challenges faced by the water environment and to optimise the benefits.</li> <li>• To enhance the quality of the natural environment for the benefit of people's health and wellbeing, giving access to aesthetic and enjoyable landscapes which are rich in wildlife.</li> </ul>	Incorporated in Sustainability Objectives ENV5 and ENV6
Environment Agency Trent Catchment Flood Management Plan (2010)	<p>A strategic planning document that provides an overview of the main sources of flood risk in the Trent catchment and how these can be managed in a sustainable framework for the next 50 to 100 years. The CFMP covers Birmingham and the Black Country and identifies that Birmingham should "take further action to reduce flood risk".</p>	Incorporated in Sustainability Objective ENV5
Environment Agency (2015) Severn River Basin District River Basin Management Plan	<p>This River Basin Management Plan seeks to protect the River Severn so that it can be enjoyed by different Districts the river runs through without each District affecting the others ability to enjoy the river. It also seeks to conserve and enhance the quality of the River Severn environment and maintain its high water quality and habitats, as the River Severn benefits from having particularly rich and diverse wildlife and habitats.</p>	Incorporated in Sustainability Objective ENV6.
The Greater Birmingham and Solihull Local Enterprise Partnership Strategy (2013)	<p>The Greater Birmingham &amp; Solihull LEP is a partnership of businesses, local authorities and universities which supports private sector growth and job creation. Set up to strengthen local economies, encourage economic development and enterprise, and improve skills across the region. The LEP has set out plans to:</p> <ul style="list-style-type: none"> <li>• Increase economic output (GVA) in the area by £8.25 billion by 2020;</li> <li>• Create 100,000 private sector jobs by 2020;</li> <li>• Stimulate growth in the business stock and business profitability;</li> <li>• Boost indigenous and inward investment;</li> </ul>	Incorporated in Sustainability Objectives ECON1 - 4

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<ul style="list-style-type: none"> <li>• Become global leaders in key sectors, including: automotive assembly, low carbon R&amp;D, business and professional services, clinical trials, creative and digital sectors; and</li> <li>• Increase the proportion of adults with appropriate qualifications to meet employment needs.</li> </ul>	
<p>Greater Birmingham &amp; Solihull Local Enterprise Partnership (2016) Strategic Economic Plan 2016-2030</p>	<p>This Strategic Economic Plan sets out a mission for the West Midlands Region: <i>'To create jobs and grow the economy of Greater Birmingham and in so doing raise the quality of life for all of the LEP's population.'</i></p> <p>This plan includes the following targets:</p> <ul style="list-style-type: none"> <li>• Create 250,000 private sector jobs by 2030 and be the leading Core City LEP for private sector job creation;</li> <li>• Increase GVA by £29bn by 2030;</li> <li>• Decrease unemployment to the National Average by 2020 and to have the lowest unemployment amongst the LEP Core Cities by 2030;</li> <li>• GBSLEP to be the leading Core City by 2030 for GVA per head;</li> <li>• Increase % of working age population with NVQ3+ to the National Average by 2025;</li> <li>• Increase productivity rates to the National Average by 2030; and</li> <li>• GBSLEP to be the Leading Core City LEP for Quality of Life by 2030.</li> </ul>	<p>Incorporated in Sustainability Objectives ECON1 - 4</p>
<p>Natural England (2012) National Character Area profile no. 67: Cannock Chase and Cank Wood</p>	<p>Cannock Chase and Cank Wood National Character Area (NCA) extends north of the Birmingham and Black Country conurbation and includes a major area of this city. It is situated on higher land consisting of sandstone and the South Staffordshire Coalfield. The NCA principally coincides with the historical hunting forest of Cannock Chase, with major remnants surviving within the Cannock Chase Area of Outstanding Natural Beauty (AONB), which supports internationally important heathland Special Areas of Conservation (SAC) and the Sutton Park National Nature Reserve.</p>	<p>Incorporated in sustainability objective ENV4.</p>
<p>Natural England (2012) National Character Area profile no. 97: Arden</p>	<p>Arden National Character Area (NCA) comprises farmland and former wood-pasture lying to the south and east of Birmingham, including part of the West Midlands conurbation. Traditionally regarded as the land lying between the River Tame and the River Avon in Warwickshire, the Arden landscape also extends into north Worcestershire to abut the Severn and Avon Vales. To the north and northeast it drops down to the open landscape of the Mease/Sence Lowlands. The eastern part of the NCA abuts and surrounds Coventry, with the fringes of Warwick and Stratford-upon-Avon to the south. This NCA has higher ground to the west, the Clent and Lickey Hills and to the east, the Nuneaton ridge.</p>	<p>Incorporated in sustainability objective ENV4.</p>
<p>Transport for West Midlands (2017) 2026 Delivery Plan for Transport</p>	<p>Movement for Growth sits alongside the WMCA Strategic Economic Plan as a complementary critical set of policies and plans - providing the overarching approach to the development a transport system into one which is fit for the challenges of economic &amp; housing growth, social inclusion and environment change.</p> <p>A modern effective, efficient and reliable transport system as envisioned by Movement for Growth forms one of the pillars underpinning the delivery of the WMCA's key objectives, namely closing the GVA gap in the West Midlands and creating 500,000 new jobs. The plan is based on improvements, year in year out, over the long term to an integrated transport system and is made up of four tiers:</p> <ul style="list-style-type: none"> <li>• National and Regional</li> <li>• Metropolitan (Metropolitan Rail and Rapid Transit Network including Sprint, Key Route Network, Strategic Cycle Network)</li> <li>• Local</li> <li>• Smart Mobility</li> </ul> <p>To support the delivery of Movement for Growth, the WMCA approved the 2026 Delivery Plan for Transport in September 2017. The plan comprises the Delivery Plan and two supporting sets of documents:</p> <ul style="list-style-type: none"> <li>• The 2026 Delivery Plan for Transport</li> <li>• 16 Corridor Strategies</li> </ul>	<p>Incorporated in Sustainability Objective ENV3</p>

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
<ul style="list-style-type: none"> <li>Four Dashboards of Schemes.</li> </ul>		
Environment Agency (2009) A Water Resources Strategy Regional Action Plan for the West Midlands Region	<p>The EA Water Resources Strategy for England and Wales, <i>Water for People and the Environment</i>, sets out a number of actions that are reflected in the Regional Action Plan. This Plan takes the aims and objectives of the strategy and identifies Regional actions that will enable:</p> <ul style="list-style-type: none"> <li>Water to be abstracted, supplied and used efficiently;</li> <li>The water environment to be restored, protected and improved so that habitats and species can better adapt to climate change;</li> <li>Supplies to be more resilient to the impact of climate change, including droughts and floods;</li> <li>Water to be shared more effectively between abstractors;</li> <li>Improved water efficiency in new and existing buildings;</li> <li>Water to be valued and used efficiently;</li> <li>Additional resources to be developed where and when they are needed in the context of a twin-track approach with demand management;</li> <li>Sustainable, low carbon solutions to be adopted; and</li> <li>Stronger integration of water resources management with land, energy, food and waste.</li> </ul>	Incorporated in Sustainability Objective ENV2
Forestry Commission (2004) West Midlands Regional Forestry Framework	<p>The Framework sets out priorities for activity across the private, public and voluntary sector, and includes priorities and actions based around the following themes:</p> <ul style="list-style-type: none"> <li>Tree and Woodland Cover;</li> <li>Trees Woodland and Forestry Industry;</li> <li>Wood Energy and Recycling;</li> <li>Recreation and Tourism;</li> <li>Health and Wellbeing;</li> <li>Fostering Social Inclusion;</li> <li>Enhancing Biodiversity;</li> <li>Climate Change; and</li> <li>Green Infrastructure.</li> </ul>	Incorporated in Sustainability Objectives ENV4 - 6 and SOC3
Peter Brett Associates LLP (2014) GBSLEP Joint Strategic Housing Study.	<p>This study outlined the oversights of past population projections for the Birmingham area and its surrounding districts/regions. It highlights a need for a considerable amount of housing building needed each year and a need for more housebuilding in the regions and districts surrounding Birmingham.</p> <ul style="list-style-type: none"> <li>Preferred scenario 2011-31 – 165,000 dwellings.</li> </ul>	Incorporated in Sustainability Objective SOC2.
West Midlands Combined Authority (2017) West Midlands Roadmap to a Sustainable Future in 2020 (Annual Monitoring Report)	<p>This report is an annual monitoring report of the progress the West Midlands Roadmap to Sustainability and includes the following objective:</p> <ul style="list-style-type: none"> <li>Reverse the rise in health inequalities for women</li> </ul>	Incorporated in Sustainability Objective SOC3.
West Midlands Combined Authority (2017) Thrive West Midlands – An Action Plan to drive better mental health and wellbeing in the West Midlands	<p>This Action Plan forms an agreement between the key organisations of the West Midlands to work together to improve the mental health and wellbeing of the residents of the West Midlands:</p> <ul style="list-style-type: none"> <li>Improve the accessibility of jobs for people with mental health issues and their general wellbeing.</li> </ul>	Incorporated in Sustainability Objective SOC3.
<b>Local</b>		
Birmingham City Council (1994) Handsworth,	Restricts non-family dwelling house uses in Handsworth, Sandwell and Soho Wards.	Incorporated in Sustainability

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
Sandwell and Soho: Areas of Restraint		Objectives ECON3 and SOC5.
Birmingham City Council (1996) Shopfronts design guide	These guidelines set out the principles of good shopfront design. They help establish the ground rules for the design of shop fronts and advertisements.	Incorporated in sustainability objective ENV2, ECON2 and ECON3.
Birmingham City Council (1999) Location of advertisement hoardings	Guidelines for outdoor advertisement hoardings, including those with mechanically changing displays, ranging from 96 sheet size to smaller 12 sheet panels, and will be used to control the display of existing and proposed hoardings. States that applications must be treated on their own individual merits, with regards to the general characteristics of the locality in which they will be displayed. Also provides specific guidance on location and land use guidelines.	Incorporated in sustainability objectives ENV2 and ECON1.
Birmingham City Council (1999) Wheelwright Road: Area of Restraint	Restricts non-family dwelling house uses in Wheelwright Road.	Incorporated in Sustainability Objectives ECON3 and SOC5
Birmingham City Council (1999) Regeneration through Conservation SPG	Sets out how the historic buildings and townscapes of the City play a central role in prompting sustainable regeneration. The strategy sets out eight priority objectives for securing this aim, including: <ul style="list-style-type: none"> <li>- Placing conservation at the heart of policies for regeneration</li> <li>- Relating conservation decisions to evolving policies for a sustainable environment</li> <li>- Maximising financial support</li> <li>- Focusing on buildings at risk</li> <li>- Producing Conservation Area appraisals</li> </ul>	Incorporated in Sustainability Objective ENV4
Birmingham City Council (2000) Parking of vehicles at commercial and industrial premises adjacent to residential property	These guidelines apply to car parking proposals relating to commercial and industrial premises which could cause noise and disturbance to occupants in adjoining residential accommodation.	Incorporated in sustainability objective ENV2.
Birmingham City Council (2000) Floodlighting of sports facilities, car parks and secure areas	Supplementary planning guidance for the installation of flood lighting. Flood lighting should: <ul style="list-style-type: none"> <li>• Point downwards.</li> <li>• Minimise the flood of light near to or above the horizontal to reduce potential glare.</li> <li>• The main floodlight beam should, where possible, be directed towards below a 70'arc from a vertical column.</li> <li>• Use asymmetrical beams that permit the front glazing to be kept at or near parallel to the surface being lit.</li> </ul>	Not specifically relevant to any single objective but covered in general terms by the majority of the Objectives.
Birmingham City Council (2001) Specific needs residential uses SPG	Guidance relating to the use of land and buildings for residential accommodation, and in certain cases associated care, to people whose housing needs may be termed 'specific'. <p>Targets:</p> <ol style="list-style-type: none"> <li>1 Parking space per 3 beds. <ol style="list-style-type: none"> <li>a) Single room used for living/sleeping/cooking – 15.0sq.m.</li> <li>b) Two room letting as living/sleeping room and separate kitchen</li> </ol> </li> </ol> <p>One individual: 12.50sq.m (135 sq.ft.) floor area Two individuals: 18.0sq.m (190sq.ft.)</p> <ol style="list-style-type: none"> <li>c) Two room letting with kitchen/living room and separate bedroom</li> </ol> <p>One individual bedroom: 6.50.sq.m (70sq.ft.) floor area</p>	Incorporated in sustainability objectives ENV2 and SOC2.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<p>One individual kitchen/living area: 11.50sq.m (120sq.ft) floor area</p> <p>Two individual's bedroom: 12.50sq.m. (135 sq.ft.) floor area</p> <p>Two individual's kitchen/living room: 15.0sq.m. (160sq.ft.) floor area</p>	
Birmingham City Council (2001) Places for living	<p>Residential development is the major land use in Birmingham and the majority of new development proposals within the city will continue to be for new homes. It is important that residential areas are desirable, sustainable and enduring. They should provide good quality accommodation in a safe and attractive environment, which people.</p> <ol style="list-style-type: none"> <li>1. Places not estates - Successful developments must address wider issues than simply building houses and create distinctive places that offer a choice of housing and complementary activities nearby</li> <li>2. Moving around easily - Places should be linked up with short, direct public routes overlooked by frontages.</li> <li>3. Safe places, private spaces - Places must be safe and attractive with a clear division between public and private space</li> <li>4. Building for the future - Buildings and spaces should be adaptable to enhance their long-term viability and built so they harm the environment as little as possible.</li> <li>5. Build on local character - Developers must consider the context and exploit and strengthen the characteristics that make an area special.</li> </ol>	Incorporated in sustainability objectives ENV2, ENV3, ENV5, ENV6, ECON3 and SOC2.
Birmingham City Council (2001) Places for all	<p>The guide was produced as a response to the lack of general design guidance that relates to all types of development throughout the city. Good design should apply everywhere not just in key locations such as the city centre and conservation areas.</p> <p>The main targets are:</p> <ol style="list-style-type: none"> <li>1. Creating diversity - The aim must be to create or build within places that have an accessible choice of closely mixed complementary activities.</li> <li>2. Moving around easily - Places should be linked up with short, direct public routes overlooked by frontages.</li> <li>3. Safe places, private spaces - Places must be safe and attractive with a clear division between public and private space.</li> <li>4. Building for the future - Buildings and spaces should be adaptable to enhance their long-term viability and built so they harm the environment as little as possible.</li> <li>5. Build on local character - Development must consider the context and exploit and strengthen the characteristics that make an area special.</li> </ol>	Incorporated in sustainability objectives ENV2, ENV5, ENV6, ECON3 and SOC3.
Birmingham City Council (2001) Affordable Housing SPG	<p>The purpose of this supplementary planning guidance is to provide an additional, complementary mechanism for securing affordable homes in response to recent government advice.</p>	Incorporated in sustainability objectives ECON2, ECON3 and SOC2.
Birmingham City Council (2003) High Places	<p>This supplementary planning guidance provides policy and design guidance for tall buildings in Birmingham. It provides guidance on the location, form and appearance of tall buildings. It provides information on:</p> <ul style="list-style-type: none"> <li>• The location of tall buildings.</li> <li>• The design of tall buildings.</li> <li>• Conservation Areas and Listed Buildings where tall buildings are inappropriate</li> <li>• The sustainability of proposals.</li> </ul>	Incorporated in sustainability objectives ENV2, ENV5
Birmingham City Council (2004) Archaeology Strategy SPG	<p>Describes Birmingham's archaeological remains and national, regional and local policies on archaeological remains affected by new development. The Strategy explains the process when proposed new development is likely to affect archaeological remains. It stresses the importance of early consultation about the archaeological implications of a proposed development and the</p>	

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	process of assessment and evaluation to inform decision making on requirements for preservation or recording of archaeological remains. The Strategy also describes particular archaeological requirements for different parts of the city.	
Birmingham City Council (2005) Developing Birmingham: An Economic Strategy for the City 2005-2015.	<p>The vision of the Economic Strategy is: <i>“To build on Birmingham’s renaissance and secure a strong and sustainable economy for our people.”</i></p> <p>The strategy identifies four key areas to focus on:</p> <ol style="list-style-type: none"> <li>1) development and Investment;</li> <li>2) creating a skilled workforce;</li> <li>3) fostering business development and diversification; and</li> <li>4) creating sustainable communities and vibrant urban villages.</li> </ol>	Incorporated in Sustainability Objectives ECON7, 8, 9 and 10.
Birmingham City Council (2006) Air Quality Action Plan.	<p>The Action Plan sets out 41 actions which follow the objectives below:</p> <ul style="list-style-type: none"> <li>• Reducing vehicle emissions;</li> <li>• Improving public transport to reduce traffic volumes;</li> <li>• Improving the road network to reduce congestion;</li> <li>• Using area planning measures to reduce traffic volumes;</li> <li>• Reducing air pollution from industry, commerce and residential areas; and</li> <li>• Changing levels of travel demand/promotion of alternative modes of transport.</li> </ul>	Incorporated in Sustainability Objective ENV6.
Birmingham City Council (2006) Municipal Waste Management Strategy.	<p>The Strategy sets out the following vision for delivering its municipal waste management services:</p> <p><i>“To run a city that produces the minimum amount of waste that is practicable, and where the remainder is re-used, recycled or recovered to generate energy. The material recovered through composting, recycling, re-use and from the energy recovery process will replace the need for extraction of virgin materials.</i></p> <p><i>The waste management strategy will be sensitive to local needs and will provide a service to help Birmingham become as clean and green a city as it can be. Birmingham City Council and the Constituency partners will provide a service that citizens are pleased to support, and where there is malpractice or deliberate misuse of the service, that this is dealt with efficiently to maintain a clean, safe and healthy environment.”</i></p> <p>The Strategy has the following objectives:</p> <ul style="list-style-type: none"> <li>• The Council will explore ways of reducing the amount of waste sent to landfill to an absolute minimum, recovering value from waste wherever economically and environmentally practicable through energy recovery and measures to increase re-use, recycling and composting;</li> <li>• The City Council and its partners will raise awareness among the wider community to view waste as a resource and will deliver communications activities and work with relevant stakeholders (such as community groups and schools) to promote the cultural change needed to significantly increase recycling and re-use and reduce the overall quantity of waste requiring treatment or disposal;</li> <li>• The City Council will develop recycling and composting system that meet the targets set out in this strategy through methods that are acceptable and accessible to the residents of Birmingham;</li> <li>• the City Council will explore ways of working with other local authorities and will expand its partnership activities with the private voluntary sectors to assist in delivery of this strategy; and</li> <li>• The City Council will work with its partners and other agencies to provide efficient and effective enforcement of its services to contribute to a clean, green, safe and healthy environment.</li> </ul>	Incorporated in Sustainability Objective ENV6.
Birmingham City Council (2006) The Future of Birmingham’s Parks and Open Space Strategy	This Strategy is intended to protect and guide the planning, design, management, maintenance and provision of parks and public open spaces in the city over the next 10-15 years. Contains 30 policies around the provision and use of green spaces and parks.	Incorporated in sustainability objectives ENV4, ENV6, ECON2 and SOC3.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
Birmingham City Council (2006) Loss of industrial land SPD	This document provides guidance on the information required by the City Council where a change of use from industrial to an alternative use is being proposed. The SPD applies to all industrial land.	Incorporated in sustainability objectives ENV1 and ECON2.
Birmingham City Council (2006) Access for People with Disabilities SPD	<p>Provides guidance under Part M of the Building Regulations and their obligations under the Disability Discrimination Act around:</p> <ul style="list-style-type: none"> <li>• Works in the Public Realm</li> <li>• Approaches to buildings and open areas within an application site</li> <li>• Entrances into buildings used by the public</li> <li>• Signage</li> <li>• Access onto upper floors</li> </ul>	Incorporated in SOC1, SOC3 and SOC5.
Birmingham City Council (2007) Extending your home: Home extensions guide	<p>A guide to tell the public about the council's policies on good design and explain what we are looking for when we assess planning applications for home extensions. Outlines three main principles:</p> <ol style="list-style-type: none"> <li>1. Respect the appearance of the local area and your home.</li> <li>2. Ensure the extension does not adversely affect your neighbours.</li> <li>3. Minimise the impact on the environment.</li> </ol> <p>Provides detailed guidance on the three principles, as well as specific guidance on types of extensions, for example back extensions and dormers.</p>	Incorporated in sustainability objectives ENV 2, ENV 4 and ECON 3.
Birmingham City Council (2007) Public open space in new residential development SPD	<ul style="list-style-type: none"> <li>• An amount of open space equivalent pro rata, to 2 ha per 1000 population will be required.</li> <li>• As part of the overall requirement, a children's play area will be required where there is no existing provision within walking distance of the new development (defined as 400m, taking into account barriers such as main roads, railways and canals, which restrict access).</li> <li>• Public open space should be sited where it will be overlooked, safe, useable and accessible to all residents and designed to local authority criteria. It should take into account the needs of people with disabilities and any cultural needs identified in consultation with local residents.</li> <li>• The key aim of large scale redevelopments is to achieve a good quality environment overall coupled with a good housing stock.</li> </ul>	Incorporated in sustainability objectives ENV2, ECON2, ECON3, SOC1, SOC3 and SOC4.
Birmingham City Council (2007) Sustainable Management of Urban Rivers and Floodplains SPD	<p>A Supplementary Planning Document which responds to the demands of the Water Framework Directives and sets out policies for development near to river corridors relating to:</p> <ul style="list-style-type: none"> <li>• Water Quality;</li> <li>• Water Pollution Prevention;</li> <li>• Sustainable Urban Drainage Systems (SUDS) and Surface Water Run-Off;</li> <li>• Character of the River Corridors;</li> <li>• The Floodplain;</li> <li>• Nature Conservation and Landscaping;</li> <li>• The Historic Environment;</li> <li>• Design of Developments;</li> <li>• Access;</li> <li>• Education and Recreation;</li> <li>• Safety and Litter; and</li> <li>• Community Involvement.</li> </ul>	Incorporated in Sustainability Objective ENV5.
Birmingham City Council (2008) Sustainable Community Strategy	The document's vision is to make Birmingham the first sustainable global city in modern Britain. It will be a great place to live, learn, work and visit: a global city with a local heart.	Incorporated in Sustainability Objectives ENV2, ENV6, SOC3,

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	Five outcomes Birmingham people will be enabled to: 1. Succeed economically 2. Stay safe in a clean, green city 3. Be healthy 4. Enjoy a high quality of life 5. Make a contribution	ECON2, SOC4, SOC5.
Birmingham City Council (2008) Birmingham Private Sector Housing Strategy 2008+ (updated 2010).	The strategy details priority issues and actions to increase levels of decent homes in owner-occupied and private rented sector housing; promote domestic energy efficiency and affordable warmth; and address the growing demand from elderly and disabled residents for assistance to live independently in their own homes. It also set out how the council will fulfil its regulatory role in the licensing and inspection of Houses in Multiple Occupation (HMOs) as prescribed by the Housing Act (2004) and promote better standards of management within the private rented sector (PRS).	Incorporated in Sustainability Objective SOC 12.
Birmingham City Council (2008) Telecommunications development mobile phone infrastructure SPD	This Supplementary Planning Document (SPD) is intended to provide guidance to the public, licensed telecommunications operators and planners on the process for the control of telecommunications development and for its siting and appearance within Birmingham.	Incorporated in sustainability objective ENV4.
Birmingham City Council (2008) Contaminated Land Inspection Strategy for Birmingham Second Edition	<ul style="list-style-type: none"> <li>• To identify any contaminated land as defined by the legislation.</li> <li>• To take steps to control any risk from any contaminated land identified using voluntary or enforcement action.</li> <li>• To liaise with the Environment Agency regarding sites that may be polluting controlled waters or other special sites.</li> </ul>	Incorporated in Sustainability Objective ENV6.
Birmingham City Council (2008) Lighting Places	<p>A supplementary planning document detailing how Birmingham's city centre should be lit. The objectives are as follows:</p> <ul style="list-style-type: none"> <li>• To foster multilateral exchange of experience, ideas, creations, technologies and expertise.</li> <li>• To encourage exchange of technical experts.</li> <li>• To organise theme based meetings.</li> <li>• To help public authorities undertake concerted action to promote illumination projects.</li> <li>• To provide a structure for this exchange within the scope of an international network of local public authorities.</li> <li>• To create arenas for research and experimentation and/or operations.</li> <li>• To include lighting issues within a perspective that is both environmentally friendly and in favour of sustainable development.</li> <li>• To enable the cities to develop an identity by means of their artistic or technical choices.</li> <li>• To impose lighting as a tool for promotion of the cities.</li> </ul>	Incorporated in sustainability objectives ENV2, ENV6, ECON1 and ECON2.
Birmingham City Council (2008) Mature suburbs	<p>The purpose of these guidelines is to set out the City Council's aspirations for such types of development within the City's mature suburbs and residential areas. It sets out key design issues for housing intensification and what is expected from developers and designers when submitting planning applications. Aims for buildings in mature suburbs to be assessed against:</p> <ul style="list-style-type: none"> <li>• Plot Size</li> <li>• Building Form and Massing</li> <li>• Building Siting</li> <li>• Landscape and Boundary Treatment</li> <li>• Plot Access</li> <li>• Parking Provision and Traffic Impact</li> <li>• Design Styles</li> <li>• Public Realm</li> <li>• Archaeology, Statutorily Listed and Locally Listed Buildings</li> <li>• Design Out</li> <li>• Renewable Energy and Climate</li> <li>• Cumulative Impact</li> </ul>	Incorporated in sustainability objectives ENV6, ECON3, and SOC2.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
Birmingham City Council (2008) Statement of Community Involvement	<p>The Statement of Community Involvement (SCI) sets out how we will encourage more people to participate in decision-making in Planning. The document sets out our minimum standards for consultation on new policies and planning applications. The key objectives are:</p> <p>a) We will consult early in the development process - this will help to ensure that the views of the community, specific consultation bodies, developers and businesses are fed into the process at the outset. Early engagement is one of the government's objectives in reviewing the planning system.</p> <p>b) Use appropriate consultation methods for each document and for each community.</p> <p>c) Use plain English for all documents.</p> <p>d) Be prepared to experiment with a wide range of innovative consultation methods. e) Ensure that everyone, including people from under-rep</p>	Incorporated in Sustainability Objective SOC5.
Birmingham City Council (2008) Large format banner advertisements SPD	<p>A supplementary planning document detailing the policy around large banners. States that:</p> <ul style="list-style-type: none"> <li>• A large format banner will only normally be permitted where a building is to be scaffolded for building or related work, and that such scaffolding covers an entire elevation.</li> <li>• A commercial advertisement element should occupy no more than 40% of the extent of the scaffolded elevation. No elevation should normally contain an advertisement element greater than 500sq.m in area or 40% of the scaffolded elevation, whichever is the lesser.</li> <li>• Within sensitive areas such as conservation areas, or on, facing or in close proximity to a listed building, the entire scaffolding mesh must be covered by a 1:1 scale image of the building being constructed/refurbished, or other similar appropriate image. The use of 1:1 scale images will be encouraged in other locations.</li> <li>• Scaffolded elevations shall have the whole elevation covered by mesh to a good quality of workmanship, and shall have any commercial element sitting within, and framed by, the mesh.</li> <li>• The scaffold and associated banner advert(s) should be removed as soon as the relevant work, as described in 3.1 above, is complete. The advertisement consent will last no longer than the agreed building programme or one year, whichever is the shorter. Consent for continued display in accordance with this policy would not be unreasonably withheld.</li> <li>• Such adverts will not normally be permitted in predominantly residential areas.</li> </ul>	Incorporated in sustainability objective ENV2.
Birmingham City Council (2010) Birmingham Climate change action plan 2010+	<ul style="list-style-type: none"> <li>• Birmingham becoming a 'Low Carbon Transition' city;</li> <li>• Improving the energy efficiency of the city's '<b>Homes and Buildings</b>';</li> <li>• Reducing the city's reliance on unsustainable energy through 'Low Carbon Energy Generation';</li> <li>• Reducing the city's impact on the non-renewable resources through 'Resource Management';</li> <li>• Reducing the environmental impact of the city's mobility needs through 'Low Carbon Transport';</li> <li>• Making sure the city is prepared for climate change through 'Climate Change Adaptation'; and</li> <li>• Making sure that this action plan 'Engages with Birmingham Citizens and Businesses'.</li> </ul>	Incorporated in Sustainability Objective ENV5.
Birmingham and Black Country Biodiversity Partnership (2010) Birmingham and the Black Country Biodiversity Action Plan	<p>Objectives are to:</p> <ul style="list-style-type: none"> <li>• Maintain and increase biodiversity of key sites and landscapes through appropriate protection and management;</li> <li>• Restore degraded habitats and key species populations by restoring key areas;</li> <li>• Link key areas with ecological corridors to reconnect wildlife populations and make them less vulnerable;</li> </ul>	Incorporated in Sustainability Objectives ENV4 and 5.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	<ul style="list-style-type: none"> <li>Promote and support the use of the natural environment to mitigate against, and adapt to the effects of climate change;</li> <li>Enable the sustainable use of the natural environment to benefit health and wellbeing of residents, workers and visitors as well as improving the local economy.</li> </ul>	
Birmingham City Council (2011) Places of worship	The document provides clear and proactive guidance to communities seeking to establish a place of worship and looking to submit applications for planning permission. Its main aim is to ensure a consistent approach to planning applications, not only for places of worship, but also for faith-related community and educational use.	Incorporated in sustainability objectives ENV4 and SOC1.
Birmingham City Council (2011) Multi-agency Flood Plan	A plan outlining flood risk, warnings mechanisms, the actions, roles and responsibilities of those organisations and communities with a key response role in the event, or threat of flooding in the Birmingham local authority area.	I Incorporated in Sustainability Objective ENV5.
Birmingham City Council (2012) Employment Land Review	<p>The Employment Land Review (ELR) provides an analysis of the employment land supply position in Birmingham, recent completions, key conclusions and recommendations for future action.</p> <p>As the supply of best urban employment land has declined over recent years. There is a need to identify new employment land opportunities to ensure that an adequate supply of land is maintained.</p> <ul style="list-style-type: none"> <li>The Washwood Heath sites be excluded from the potential best urban supply at present due to the proposed HS2 route safeguarding.</li> <li>Given that the supply of good urban land is low and the scope for new opportunities is limited, existing good urban employment land be retained in industrial use and new opportunities safeguarded.</li> <li>That the approach for the Protection of Employment land set out in the Supplementary Planning Document on the 'Loss of Industrial Land to Alternative Uses' be maintained. This aims to protect good quality sites whilst recognising that poor quality and outdated sites should either be upgraded or used for new development where appropriate</li> <li>Maximise the use of available funding sources to promote the delivery of key employment sites such as the Regional Investment Site at East Aston.</li> <li>The City Council continues to work proactively with property agents, major companies, landowners and developers to bring sites forward for development. The use of Compulsory Purchase Orders to assemble land to facilitate employment development be considered where necessary.</li> <li>Where developments involve the loss of employment land an appropriate Section 106 contribution should be secured and utilised to improve other 5 industrial sites. When the Community Infrastructure Levy is adopted a proportion of the monies raised should also be used to improve existing industrial sites.</li> <li>The Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) consider the supply of land for strategic sites such as Major Investment Sites and Regional Logistic Sites and the mechanism for delivery.</li> </ul>	Incorporated in Sustainability Objectives ECON1 and ECON3.
Birmingham City Council (2012) Shopping and Local Centres SPD	<p>This expands on policies for shopping and local centres in the UDP and to bring Birmingham's policies for shopping and local centres up to date and in line with national planning policy.</p> <ul style="list-style-type: none"> <li>Within the Primary Shopping Areas at least 55 % of all ground floor units in the Town and District Centres should be retained in retail (Class A1 use) and 50% of all ground floor units in the Neighbourhood Centres should be retained in retail (Class A1) use.</li> <li>Applications for change of use out of A1 will normally be refused if approval would have led to these thresholds being lowered, unless exceptional circumstances can be demonstrated in line with Policy 3.</li> <li>No more than 10% of units within the centre or frontage shall consist of hot food takeaways.</li> <li>Applications for new A3, A4 and A5 uses are encouraged within the Centre Boundary of Town, District and Neighbourhood Centres,</li> </ul>	Incorporated in sustainability objectives ENV2, ECON1, ECON2 and ECON3.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	subject to avoiding an over concentration or clustering of these uses that would lead to an adverse impact on residential amenity.	
Birmingham City Council (2012) Car Parking guidelines SPD	A Development Plan Document providing detail on car parking standards. The parking standards guidance is intended to be considered alongside a number of other local policies. Encourages the use of sustainable travel, including electric vehicles, car clubs and cycling.	Incorporated in sustainability objectives ENV2, ENV3 and SOC1.
Birmingham City Council (Jan 2012) Level 1 & 2 Strategic Flood Risk Assessment	Assesses and maps all known sources of flood risk, including fluvial, surface water, sewer, groundwater and impounded water bodies, taking into account future climate change predictions, to allow the Council to use this as an evidence base to locate future development primarily in low flood risk areas. The outputs from the SFRA will also assist in preparing sustainable policies for the long term management of flood risk.	Incorporated in Sustainability Objective ENV5.
Birmingham City Council (2013) Strategic Housing Market Assessment	<p>This evidence based document was commissioned by Birmingham City Council in March 2012 to enable the Council to develop planning and housing policies and take decisions which encourage the provision of the most appropriate mix of housing (in terms of type, size, tenure, and affordability)</p> <p>The study bears directly on two areas of Council policy, housing and planning. It should inform affordable housing policies, by assessing both the total need for affordable housing and the profile of that need in terms of household sizes and types. It should also inform planning policies in the emerging Core Strategy, in particular the housing target, showing how much housing development the Council should provide land for in the next 20 years, in both the market and affordable sectors.</p> <p>The study established that for the housing market area (comprising Birmingham, the Black Country, Bromsgrove, Coventry, Lichfield and Solihull), the best available estimate of objectively assessed housing need to 2031 is for some 9,300 net new homes per annum.</p>	Incorporated in Sustainability Objective SOC2.
Birmingham City Council (2013) Health and Well-being Strategy (Updated Priorities 2017)	<ul style="list-style-type: none"> <li>• Improve the wellbeing of children •Detect and prevent Adverse Childhood Experiences (ACEs).</li> <li>• Improve the independence of adults.</li> <li>• Improve the wellbeing of the most disadvantaged.</li> <li>• Make Birmingham a Healthy City.</li> </ul>	Incorporated in Sustainability Objective SOC3.
Birmingham City Council (2013) Employment Land and Office Targets	This evidence based document provides robust evidence in relation to future requirements for industrial land and office space up to the year 2031. The study helped to inform TP17-TP21 in the Birmingham Development Plan.	Incorporated in Sustainability Objectives ECON1, ECON3 and ECON4.
Birmingham City Council (2013) Green Living Spaces Strategy	Includes seven green living spaces principles but no formal objectives or targets.	Incorporated in Sustainability Objectives ENV4 and SOC3.
Birmingham City Council (2013) Birmingham Health and Wellbeing Strategy	<p>Identifies priorities and delivery mechanisms for addressing acute and chronic health and well-being issues across the City, some of which are closely related to spatial planning. These include aspirations to:</p> <ul style="list-style-type: none"> <li>• Create fair employment and good work for all;</li> <li>• Ensure Healthy Standard of living for all; and</li> <li>• Create and develop healthy sustainable homes and communities</li> </ul>	Incorporated in Sustainability Objectives SOC1, SOC2, ECON4
Birmingham City Council (2013) Carbon Roadmap	60% reduction in CO2 emissions by 2027.	Incorporated in sustainability objective ENV5.
Birmingham City Council (2014) Gypsy and Traveller Accommodation Assessment	Estimates a need for 4 additional pitches during the period 2014-2031.	Incorporated in Sustainability Objective SOC2.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
Birmingham City Council (2014) Birmingham Connected White Paper	<p>Birmingham Connected is directly linked to the strategies and policies of the BDP. Investing in a radically improved integrated transport system will realise the city's potential to support sustainable economic growth, job creation and linking communities.</p> <p>As well as the above Birmingham Connected covers a number of other agendas. Its vision is to create a transport system which puts the user first and delivers the connectivity that people and businesses require. We will improve people's daily lives by making travel more accessible, more reliable, safer and healthier and using investment in transport as a catalyst to improve the fabric of our city. We also want to use the transport system as a way of reducing inequalities across the city by providing better access to jobs, training, healthcare and education as well as removing barriers to mobility.</p>	Incorporated in Sustainability Objectives ENV 3, ENV6, ECON2, SOC1 and SOC3.
Birmingham City Council (2014) Protecting the Past – Informing the Present. Birmingham's Heritage Strategy (2014-2019)	<p>The strategy sets a direction for the City's heritage sector for the next 5 years and is a partnership document for the city as a whole, not a Council strategy and reflects the need to attract funding and other kinds of support from a wider constituency of interest and the opportunity to work with partners outside the authority in promoting the city's heritage tourism assets.</p> <p>The strategy contains no formal objectives or targets.</p>	Incorporated in Sustainability Objective ENV4
Birmingham City Council (2015) Birmingham Surface Water Management Plan	<p>A study undertaken in consultation with key local partners who are responsible for surface water management and drainage in their area. Partners work together to understand the causes and effects of surface water flooding and agree the most cost effective way of managing surface water flood risk for the long term. The process of working together as a partnership is designed to encourage the development of innovative solutions and practices.</p>	Incorporated in Sustainability Objective ENV5.
Birmingham City Council (2015) Corporate Emergency Plan	<p>Aim of the plan delivered through the following objectives:</p> <ul style="list-style-type: none"> <li>• To provide an overview of the civil emergency risks which can give rise to emergencies / major business disruptions requiring activation of this plan;</li> <li>• To outline emergency management and business continuity responsibilities of the Council at a corporate and directorate level, including specialist capabilities, such as emergency welfare provision, information and communication systems;</li> <li>• To provide a summary of equipment and facilities available for corporate emergency response actions;</li> <li>• To clarify wider resilience structures for both planning and response; and</li> <li>• To summarise corporate training and exercises and other assurance processes.</li> </ul>	Not specifically relevant to anyone objective but covered in general terms by the majority of the Objectives.
Birmingham City Council (2017) Local Flood Risk Management Strategy	<p>Includes the following objectives:</p> <ul style="list-style-type: none"> <li>• Identify all stakeholders with a role in flood risk management , set out their responsibilities and work with them to adopt a partnership approach to managing local flood risk;</li> <li>• Develop a clear understanding of flood risk from surface water, groundwater and ordinary watercourses and set out how this information will be communicated and shared;</li> <li>• Outline how flood risk assets are identified, managed and maintained and develop a clear understanding of riparian responsibilities;</li> <li>• Define the criteria and for responding to and investigating flooding incidents, and set out the role of emergency planning, flood action groups and individual property owners;</li> <li>• Define the criteria for how and when flood risk management measures will be promoted to ensure that they provide value for money whilst minimising long-term revenue costs and maximising external funding contributions;</li> <li>• Minimise the impact of development on flood risk by developing guidance, policies and standards that manage flood risk and reduce the risk to existing communities; and</li> <li>• Adapt a sustainable approach to managing local flood risk by ensuring actions deliver wider environmental benefits.</li> </ul>	Incorporated in Sustainability objective ENV5.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
Birmingham City Council (2017) Birmingham Cultural Strategy	<p>Our strategy 'Imagination, Creativity and Enterprise' represents the cultural fabric of Birmingham. It was developed in partnership with many cultural sector organisations, businesses, educational institutions and individuals. Multiple agencies use it to deliver the agreed actions and outcomes and advocate on behalf of the cultural sector.</p> <p>The strategy has five themes through which the vision will be delivered:</p> <ol style="list-style-type: none"> <li>1. Culture on Our Doorstep Becoming a leader in cultural democracy where people come together to co-create, commission, lead and participate in a wide range of locally relevant, pluralistic and community driven cultural ventures.</li> <li>2. Next Generation Ensuring that all children and young people have opportunities to engage with a diverse range of high quality arts and cultural experiences at every stage of their development and which they value as worth it.</li> <li>3. A Creative City Supporting and enabling the growth of creative and cultural SMEs and micro-businesses and individuals through business support, skills and talent development and access to finance.</li> <li>4. Our Cultural Capital Cementing Birmingham's role and reputation as a centre of imagination, innovation and enterprise, with local roots and international reach.</li> <li>5. Our Cultural Future Adapting our business models to ensure they are capable of sustaining and growing the sector into the future through collaboration, diversification, rebalancing and devolution</li> </ol>	Incorporated in Sustainability Objectives ENV4, SOC1, and ECON4 .
Birmingham City Council (2017) Birmingham Development Plan	A Development Plan Document which sets the long-term spatial planning vision and objectives for Birmingham. It contains a set of strategic policies that are required to deliver the vision including the broad approach to development.	Incorporated in all Sustainability Objectives
Birmingham City Council (2018) Council Plan and Budget 2018+	Birmingham City Council's Council Plan and Budget for 2018/19 – 2021/22 setting the objectives, priorities and spending plans of the City Council and the tough decisions that have been made for the 2018/19 financial year ensure a balanced financial position and long-term financial sustainability.	Incorporated in all Sustainability Objectives
Birmingham City Council (2018) SHLAA 2017	The SHLAA is a study of sites within Birmingham that have the potential to accommodate housing development. Its purpose is to provide evidence to support the Local Development Framework, in particular the Birmingham Development Plan. It is a key component of the evidence base to support the delivery of land to meet the need for new homes within the city. It is not a decision making document and it does not allocate land for development.	Incorporated in Sustainability Objective SOC2.
Birmingham City Council (2018) Community Cohesion Strategy (Green Paper)	<p>The Birmingham Community Cohesion Strategy (Green Paper) sets out proposals for a collaborative approach in which the City Council works alongside residents, local organisations and city partners to ensure Birmingham is a place where people from different backgrounds can come together to improve things for themselves and their communities. This is a draft (Green Paper) document at present but is expected to be adopted during 2019.</p> <p><a href="https://www.birminghambeheard.org.uk/economy/community-cohesion-strategy/">https://www.birminghambeheard.org.uk/economy/community-cohesion-strategy/</a></p>	Incorporated in Sustainability Objectives ENV4, SOC1, and ECON4 .
Birmingham City Council (n.d.) Car park design guide	A design guide providing detail on the design objectives and components of car park design required by the council. Includes a provision for those with mobility difficulties and takes into account issues around safety and security.	Incorporated in sustainability objectives ENV2, ECON3, SOC1 and SOC4.



## Appendix C

# Scoping Report Baseline

Birmingham is the United Kingdom's second largest urban conurbation and neighboured by several other large conurbations, such as Solihull, Wolverhampton, and the towns of the Black Country. It is situated just to the west of the geographical centre of England on the Birmingham Plateau - an area of relatively high ground, ranging around 150-300 metres above sea level. With the Clent, Waseley and Lickey Hills towards the south-west of the City, Birmingham slopes gently to the east of the conurbation. Birmingham is at the heart of the West Midlands Region which also contains the city of Coventry and the Black Country city region. It is the major centre for economic activity and is the major contributor to the regional economy. The City has a vibrant city centre, a strong cultural mix and contains many prosperous areas. The continued urban renaissance of Birmingham, as the regional capital, has been crucial to the Region. This period of renaissance has brought about the successful delivery of key infrastructure projects such as the development of extended public transport networks. These have been vital to improving the City's local, regional and national accessibility. The city also has an international airport acting as a key gateway to the region and is well served by the M5, M6 and M40 providing access to a number of key cities across the UK.

## Material Assets

### Resource Use

There are no active mineral workings in Birmingham, and no extant planning permissions for mineral extraction. This is due to the lack of naturally-occurring minerals in Birmingham for which there is a demand. As a result, Secondary Aggregates are derived from a very wide range of materials that may be used as aggregates. Secondary aggregates include by-product waste, synthetic materials and soft rock used with or without processing. According to the Study<sup>23</sup>, in 2003, about 4.29 million tonnes of recycled aggregate and about 0.65 million tonnes of recycled soil were produced in the West Midlands.

Most of Birmingham is in the area served by Severn Trent Water with a small area to north served by the South Staffordshire Water Company. In 2004 domestic water consumption was 137 litres/head/day<sup>24</sup>. This was lower than the national average in 2007/08 of 14 litres/head/day (Audit Commission<sup>25</sup>).

The current Water Resources Plan<sup>26</sup>, prepared by Severn Trent Water for the Birmingham Water Resource Zone includes the development of four significant new water resources. These developments mean that the growth identified in the Water Resources Plan can be accommodated without the zone going into deficit. This zone requires new water resource developments to keep the zone in surplus without which the zone will go into a significant deficit by 2030. Abstraction is licensed by the Environment Agency on a catchment basis<sup>27</sup> which set show they will manage water resources in the Tame, Anker and Mease catchments. It provides information on how existing abstraction is regulated and whether water is available for further abstraction. The strategy details delivery commitments under the Water Framework Directive, ensuring no ecological deterioration of rivers. New additional water management measures or water resources will be

---

<sup>23</sup> Communities and Local Government (2007) Survey of Arisings and Use of Alternatives to Primary Aggregates in England, 2005: Construction, Demolition and Excavation Waste

<sup>24</sup> <http://www.defra.gov.uk/sustainable/government/progress/regional/summaries/16.htm>

<sup>25</sup> <http://www.defra.gov.uk/sustainable/government/progress/national/16.htm>

<sup>26</sup> Severn Trent Water (2013) Water Resources Management Plan

<sup>27</sup> Environment Agency (2013) Tame, Anker and Mease Licensing Strategy at: <https://www.gov.uk/government/publications/cams-tame-anker-and-mease-abstraction-licensing-strategy>

needed to ensure water is available to meet the needs of new housing. New foul drainage infrastructure will also be required to support the proposed level of growth.

### **Sustainable Design, Construction and Maintenance**

Environmental improvements by the City Council during the late 1980s and early 1990s have improved the overall quality of the environment within the City Centre. There have been notable successes in relation to improving the quality of design and the environment, particularly in the City Centre. This was recognised by the award to the city of the RTPI Silver Jubilee Cup in 2004. Good design continues to be evident in recent and ongoing developments, such as the Birmingham High Performance Centre at the Alexander Stadium, the Attwood Green Area and Brindley Place.

Eastside was conceived as a demonstration of sustainable development principles. In addition to the CHP network, renewable energy technology like wind and solar power will be placed on site along with green roofs and sustainable urban drainage systems. Several large building schemes in Birmingham have achieved high BREEAM Buildings and Ecohomes/Code for Sustainable Homes ratings, exemplifying sustainable building practice. There are currently 39 BREEAM Excellent buildings within Birmingham. There are no BREEAM Outstanding buildings. Commercial buildings include 19 George Road (Excellent), Calthorpe House (Excellent) and Baskerville House (Excellent). The homes at Attwood Green received Excellent Ecohomes standard.

### **Renewable Energy**

Birmingham imports in the region of 22,800GWhr of energy per year costing the City's population and businesses over £1.5bn, with costs predicted to rise along with fuel prices over the coming years.<sup>28</sup> The city currently produces just 1% of the £1.3bn of energy that its residents and businesses purchase and consume each year. This not only represents a significant loss of money from the local economy, more critically, it leaves the city exposed to threats from energy security, low levels of resilience, as well as price fluctuations in global energy trading which affect energy bills, having a significant impact upon fuel poverty. BCC has therefore committed to developing energy activity in the city to bring about a more decentralised energy system, and to improve the social and economic opportunities of its residents by addressing fuel poverty and decarbonisation of energy. BCC has begun to tackle this through a focus on energy, and understanding where and how decentralised energy systems could provide major opportunities for the city to produce, control and distribute heat and power networks.

The Climate Change Strategic Framework<sup>29</sup> identifies that 46% of Birmingham's CO<sub>2</sub> emissions come from industry, 33% from domestic energy and 21% from road transport. The Framework outlines that Birmingham has limited scope for large-scale renewable energy projects; however, energy users can support developments elsewhere through their purchasing decisions. Furthermore, it is acknowledged in the Annual Monitoring Report<sup>1</sup> that the City Council currently does not monitor the provision of new renewable energy capacity although consideration is being given by the Council to ways of monitoring additional renewable energy capacity installed through new development. Photovoltaic panels are currently fitted to some buildings as part of the 'Birmingham Energy Savers Scheme' BES resulted in the construction of 3,000 (5%) of its planned energy saving measures.

The largest renewable energy scheme currently operating in Birmingham is the Tyseley Energy from Waste Plant facility which produced a total of over 95,030.50 tonnes of ash between April 2010 and March 2011 and generates 25MWh per annum, from the thermal treatment of waste. A total of 80,241.22 tonnes of bottom ash that was produced was sent for recycling in Castle Bromwich where metals are removed and recycled with the remaining material used within the construction industry. This is substantially short of the target for renewable energy to account for 15% of energy produced by 2020 in the Climate Change Strategy and

---

<sup>28</sup> Birmingham City Council website 'Renewable Energy'

<sup>29</sup> Birmingham City Council (2009) Cutting CO<sub>2</sub> for a Smarter Birmingham Strategic Framework

Action Plan Consultation 2007. The City has a number of operational 'Combined Heat and Power' (CHP) facilities, such as Birmingham Children's Hospital and Aston University which are part of an award-winning CHP scheme, which are able to generate and supply heat and electricity for local consumption. Birmingham District Energy Scheme is a co-joint co-operation between ENGIE and Birmingham City Council. The scheme is the fastest growing in the UK, with the Council House, ICC, Aston University and Birmingham Children's Hospital among the buildings benefitting from more efficient energy. It incorporates three district energy networks, all built and operated by ENGIE through the Birmingham District Energy Company (BDEC):

1. Broad Street – a tri-generation (heat, power and cooling) system;
2. Aston University – CHP (combined heat and power) system; and
3. Birmingham Children's Hospital – CHP system.

The Council signed a 25-year energy supply agreement in 2006. The scheme helps Birmingham to save more than 15,000 tonnes of CO<sub>2</sub> emissions every year. Two residential towers are connected to the District Heat network - Crescent and Cambridge towers, situated at the rear of the ICC. The secondary delivery to these blocks is owned by BCC. The 'total cost of ownership' of access to heat and power infrastructure, servicing, maintenance, as well as heating and power costs are currently estimated at around 5% less per year. Developers have also shown an interest in bringing forward Anaerobic Digestion (AD) energy generating schemes. As set out in the AMR 2013, the Council will work positively with developers to realise the opportunities that AD hold and emphasise the potential of AD technology for use within Birmingham City Centre as it is a technology seen by the Government as a sustainable and viable waste management solution which utilises waste as a valuable resource.

The city also has a number of district heat networks. An energy network feasibility study is currently in progress to help with the development of up to 3 potential energy network opportunities. The Langley Sustainable Urban Extension (SUE) is currently underway and will deliver approximately 6,000 new homes, with a focus on family housing. As stated in the Birmingham Development Plan, adopted January 2017, the new neighbourhood will provide for a mix of housing sizes, types and tenures, including affordable housing in line with the requirements in Policy TP31 (35%). The site is adjacent to a BCC owned site called Peddimore; a large industrial development location; and energy networks are currently being considered in both locations with a potential interconnection at a new junction on the A38. BCC has recently secured feasibility funding from HNDU to further refine this significant network opportunity and consider the potential to deliver affordable and low carbon heat to businesses and residents alike. Selly Oak's large energy demands of the acute care NHS sites in Selly Oak has been under consideration for some time as a potential connection since HNDU funding was secured in 2016. BCC owned housing blocks Thirlmere House and Windemere House are in close proximity to the hospital trust site and are currently heated via electric storage heaters. As this study continues, the potential to convert these buildings to wet heating systems and adopt them onto a local network will be assessed.

## Energy Use

There are 100,000 dwellings in the city which are more than 80 years old according to the Birmingham Sustainability Strategy and Action Plan 2000-2005. As a result, the construction form is intrinsically energy-poor. Recent developments, such as the Birmingham High Performance Centre at the Alexander Stadium, have incorporated innovative, energy-efficient design. Although they are not referred to as 100% sustainable energy systems, CHP can be a more efficient energy system generating and supplying heat and electricity for local consumption. Heating is by far the largest domestic use of energy in Birmingham. Space heating accounts for 62% of use, while water heating accounts 22%. This is exacerbated by a large number of homes that do not meet Decent Homes standards, including 49,250 Council-owned homes and an estimated 35,000 private sector dwellings.

Only a very small fraction of Birmingham's building stock is built new each year, so new building standards will take decades to have a significant impact on resource use across the city, making the condition of the existing building stock very important. There are no indicators of the age or quality of the building stock as a whole in Birmingham, but energy use data suggest there are a large number of homes of poor quality that

contribute to high energy usage. The Sustainable Community Strategy sets out a vision for Birmingham in 2026 to become the first sustainable global city in Britain. The strategy envisages that in 2026 Birmingham will lead on Climate Change with local energy generation from CHP and cooling schemes will reduce CO<sub>2</sub> emissions. If Birmingham is to become the first sustainable global city it needs to dramatically increase deployment in low carbon energy generation technologies. The UK has signed up to the European Renewable Energy Directive, which sets a target of 15% of all energy generated to be sourced from renewable sources by 2020.

The Climate Change Framework aims that by 2026 Birmingham will provide an improved quality and choice of housing and 'decent' standard for virtually all housing, with efficient heating systems and insulation in line with the best UK cities.

## Sustainable Transport

### Rail and Metro

The BDP sets out the transport improvements required to deliver the growth agenda to support development and attract investment. Birmingham Connected provides the long-term strategy for improving the City's transport system. This includes measures challenging the car culture, significant investment in walking and cycling and new high quality public transport routes such as Metro, 'Sprint' (the bus rapid transit system) and heavy rail. This is being supplemented by a number of proposals including the Birmingham Cycle Revolution, 20mph zones and the West Midlands Bus Alliance.

The proposed High Speed 2 (HS2) rail link, initially between Birmingham and London, will bring radically improved rail connections into the City Centre when it opens in 2026, as well as a significant number of new jobs and visitors to the City. This will be supported by the HS2 Connectivity Programme to ensure that the wider region has access to the benefits that HS2 will bring.

Birmingham is at the heart of the rail network and in easy reach of millions of people. The £600m redevelopment of New Street Station was opened in 2016 providing a bright modern transport hub and enhanced facilities. There is also a network of suburban and freight rail services.

The Midland Metro is a light-rail/tram line in the county of West Midlands, England, operating between the cities of Birmingham and Wolverhampton via the towns of West Bromwich and Wednesbury. The Midland Metro extension from Snow Hill to New Street Station was completed in 2016. Upwards of £300 million is being invested in extending the network that will link key city centre destinations - New Street Station with HS2 at Birmingham Curzon, the business district at Snow Hill, the civic areas around Victoria Square and Centenary Square, Digbeth and Birmingham Smithfield.

The line has potential to extend across a wider area running from Birmingham Smithfield to the south of the City to the University of Birmingham, Life Sciences Campus and Queen Elizabeth Hospital. And also from Birmingham through east Birmingham to Birmingham Airport.

### Road

Birmingham has a complex road network with around 12 major radial roads and ring roads traversing the city. There are also three busy motorways: the M5, M6 and M42, located towards the west, north and east of the city respectively. Although there has been a recent rise in the use of the car, there has been a reduction in average travel speeds. Much of this is due to outward migration of people, which has in turn led to longer car journeys; there have also been a number of out-of-town developments in recent years which have encouraged additional car journeys to be made. Increased congestion has however resulted in lower average vehicle speeds. Congestion is a significant issue and demand exceeds available capacity at certain times and in some locations, both on road and rail. Congestion has indirect and cumulative effects on the economy, on people's health and well being and on air quality. Congestion can make deliveries less reliable and deter investment. Congestion also affects the wider transport of goods and services via the M5 and M6 and whilst the opening of the M6 Toll has provided an alternative for some trips, there are still significant peak hour demands that require management.

The Highways Agency (HA) Midlands Motorway Box (MMB) Route Management Strategy highlights a number of problems and issues that affect both the HA and the local authority networks. The MMB network caters for a mixture of commuter and long distance strategic traffic, the M5 and M6 form part of the Trans-European Network, with a peak hour period of around 18 hours. The route has a high regularity of junctions, 13 miles of the route is elevated making it difficult to plan and carry out maintenance and the MMB is sensitive to changes in demand and flow when large scale events are held such as those at the National Exhibition Centre (West Midlands Local Transport Plan 2006). Casualties are disproportionately higher in deprived areas. The West Midlands Metropolitan Area is on course to reduce the number of people killed or seriously injured by 2010 by 40%, reduce the number of children killed or seriously injured by 50%. This good progress is reflected in the area’s designation as a Centre of Excellence for Integrated Transport specialising in road safety.

**Bus and Coach**

Approximately 85% of all public transport trips in Birmingham are handled by the city’s buses. The bus network is operated by a number of companies, with services along the main radial routes providing good coverage to the City Centre. There are priority measures in place on a number of these routes, such as Digbeth High Street, while others are planned. Pedestrianisation limits bus traffic to a few key corridors in the City Centre, which reduces capacity and creates significant environmental problems along these routes. Coach travel is also important, particularly in providing an inexpensive means of longer distance travel for those on low incomes. The city has a number of on-street coach set down and pick up points around the City Centre. The Brewery Street Lorry and Coach Park has capacity for up to 32 18.5m/14m vehicles.

**Travel Behaviour**

Birmingham has a relatively high percentage of households without a car – 35.8% compared to the English average of 25.6%<sup>30</sup>. However, despite this fact, just over half of people who both live and work in the City use their car to get to work, only a fifth use the bus, and a tenth walk or work from home<sup>18</sup>. In contrast, over three quarters of people commuting into the city use a car, about a tenth use the train, and a further tenth travel by bus. Table 4.2 shows statistics for people travelling to work in Birmingham.

Table 4.2 Means of Travel to Work in Birmingham, 2001 (Census 2001)

Travel to Work - Method	% of those working		
	Live in Birmingham, works outside	Live and work in Birmingham	Work in Birmingham, live outside
Work at/from home	0	9.5	0
Train	2.9	2.4	10.3
Bus	12.8	22.1	10.2
Car	78.3	52.4	75.5
Walk	2.7	10.4	1.2
Other	3.3	3.2	2.8
Total (100%)	79,000	288,000	162,000

Source: ONS 2001 Census

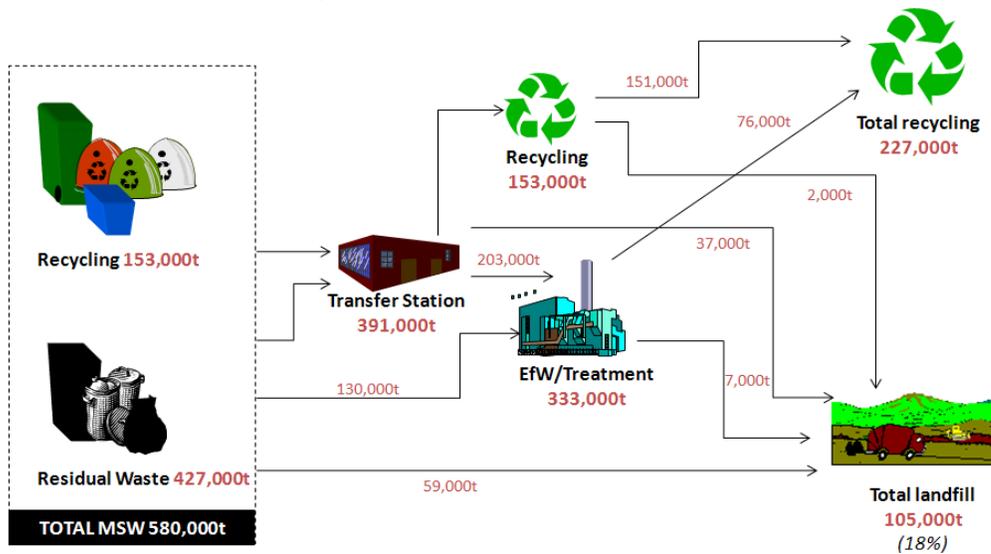
The picture is different for trips to the city centre with over 60% of trips arriving by non-car modes. According to the Birmingham Cordon Surveys, the total number of car trips entering Birmingham City Centre during the morning peak hours (07:30-09:30 hrs) has decreased in the past ten years. However, the number of bus trips remained relatively constant with a slight decrease since 2005, while the number of rail trips has

<sup>30</sup> Birmingham City Council (2014) Annual Monitoring Report 2013

increased since 2001. In 2006/7 some 62.7% of bus users in the West Midlands metropolitan areas were satisfied with services which already exceeds the target of 60% by 2009/10 (West Midlands Local Transport Plan Delivery Report 2006-2008). Bus punctuality<sup>31</sup> in 2006/7 was about 65%, marginally below the target. Performance has tended to vary from year to year and from corridor to corridor (West Midland Local Transport Plan Delivery report 2006-2008). In 2011, 8 out of 10 journeys made by public transport were made by bus The Bus Alliance is committed to ensuring that all buses in the region are a minimum of Euro V by 2020 (West Midland Local Transport Plan Delivery Report 2017/18). The Transportation and Street Services Overview and Scrutiny Committee set a target of 83% by 2010/11. Waste Management.

In 2012/13 there was 488,867 tonnes of municipal waste collected of which 70.48% was used to recover heat and power from the Tyseley EfW facility. Municipal waste is a significant part of the waste stream, but only represents a small proportion of the total amount of waste produced in Birmingham (Figure 4.1).

Figure 4.1 Destination of Birmingham's Waste Stream



Note: Tonnage figures are rounded to nearest '000 & are based on calendar year 2008 in order to cross match figures with data in the Environment Agency waste data interrogator 2008

Source: [http://www.birmingham.org.uk/documents/Birmingham\\_Total\\_Waste\\_Strategy\\_Final\\_Report\\_24.11.10.pdf](http://www.birmingham.org.uk/documents/Birmingham_Total_Waste_Strategy_Final_Report_24.11.10.pdf)

Birmingham's recycling and composting rates have been improving over the past ten years and the current performance (for 2012/13) is 32%. The percentage of waste sent to landfill is 7.48% for the 2012/13. Both rates represent a significant improvement in performance over the past decade (Table 4.3).

According to the Municipal Waste Management Strategy, the amount of household waste generated per person is lower in Birmingham than in other metropolitan authorities, and its rate of growth has also been lower than the national growth. Birmingham City Council recovers energy from the majority of its 'residual' municipal waste through the Tyseley Energy from Waste Plant (EfW)<sup>32</sup>. This reduces reliance on landfill as a disposal option The Strategy identifies that the City Council has sufficient municipal waste treatment capacity up to 2019.

<sup>31</sup> Birmingham City Council (2007) Building Bus Use: A Report from Overview & Scrutiny

<sup>32</sup> Birmingham City Council (2006) Municipal Waste Management Strategy 2006-2026

Table 5.3 Municipal Waste Arising in Birmingham and Methods of Management 2002 - 2013

Year	Waste Arising (tonnes)	Waste Recycled/Composted		Waste Recovered EFW		Waste sent to Landfill		% of 2001 level sent to landfill
		Tonnes	%	Tonnes	%	Tonnes	%	
2002/3	536,191	50,519	9.42	352,535	72.80	123,347	23.00	63.08
2003/4	551,691	58,442	10.70	337,491	61.20	126,778	22.97	64.83
2004/5	568,035	69,924	12.30	340,127	59.87	112,726	19.84	57.65
2005/6	557,810	77,744	13.93	338,605	60.70	102,588	18.39	52.46
2006/7	570,591	96,929	18.39	313,775	47.92	101,372	17.76	51.82
2007/8	565,548	123,572	26.43	325,167	51.96	107,699	19.04	55.05
2007/8	543,645	140,541	30.59	335,346	61.68	77,763	14.30	39.75
2008/9	527,207	138,589	31.78	334,409	63.47	64,748	12.28	33.10
2010/11	508,884	131,001	32.00	341,684	67.15	52,800	10.37	26.94
2011/12	484,099	124,537	31.28	348,157	71.92	23,804	4.92	12.18
2012/13	488,867	130,035	32.31	344,526	70.48	36,584	7.48	18.72

Source: BCC AMR 2013

### Efficient Use of Land

Since 2002/03, the proportion of new housing developed on previously developed land (PDL) has been high (at over 90%) and generally increasing with the exception of 2008/9 when slightly less housing completions (89%) took place on PDL. No housing completions taking place on greenfield land in 2009/10. The density of new housing completions over the decade to 2011/12 has been 65% for 50+ dwellings per ha, 28% for 30-50 dph and 7% for less than 30 dph. The average density of development over the decade to 2011/12 is 59.6 dph, falling from a peak of 80dph in 2008/09 reflecting the fall in apartment development.

### Soil Quality

As most of Birmingham is built-up, there is very little soil of a high quality. There is agricultural land situated to north-east of the City at Sutton Coldfield and a lesser amount is to be found at Woodgate Valley to the south-west. In terms of agricultural land classification, almost the whole of Birmingham is classified as Urban and just a small area in the north and north east are classified as Grade 3 agricultural land (MAGIC website).

There are a number of sites which could be subject to land contamination within Birmingham. This includes a total of 67 former known landfill sites that have been identified in the City since the 1960s although risk and remediation schemes have already been carried out on many of these sites. The majority of identified landfill sites are situated next to housing and some are located on Birmingham's major aquifer. Public open space within the city, except for the 85ha that former landfills, this land is not likely to be affected by contamination<sup>33</sup>.

Historically, Birmingham has had a very broad spectrum of manufacturing industries. Many of these have the potential to leave a legacy of land contamination. As with many industrial cities, energy requirements have changed as new technologies have become available. Birmingham is no exception. The production of energy from coal to produce town gas or electricity has obvious contamination issues and there are several areas of Birmingham where historically such activities have been undertaken. At the heart of the United Kingdom's

<sup>33</sup> Birmingham City Council (2008) Contaminated Land Inspection Strategy for Birmingham Second Edition

road and rail network Birmingham has considerable areas of land which may be contaminated due to transportation activities. These include roads, canals, railways and airports.

Waste disposal activities in Birmingham range from complex waste treatment plants dealing with highly hazardous waste to waste transfer stations handling inert building waste and soil. The potential land contamination issues in respect of landfill sites have been considered previously, but all waste disposal activities will be the subject of assessment.

The Council is required under Section 78R of Part IIA of the Environmental Protection Act 1990 to maintain a Public Register of Contaminated Land of which there are 121 entries.

### **Influence of the DM DPD on Material Assets**

The DM DPD is likely to have a mixed and indirect influence on material assets through the granting of planning permission which will entail additional resource use. However, the requirements for increasingly demanding standards of energy efficiency and waste management in the construction and running of buildings will bring about improved resource use overall as will the maintenance of the preference for the use of previously developed land. Detailed design requirements and conditions associated with the granting of planning permission could also be influential in encouraging more sustainable travel, for example in restricting parking spaces.

## **Climatic Factors**

### **Climate Change**

UK Climate Change Projections (UKCP09)<sup>34</sup> suggest that mean summer temperatures could rise by 2.6°C, summer rainfall could decrease by 17% and winter rainfall could increase by 13% in the West Midlands by the 2050s. These are the central estimates for a medium emissions scenario. By the 2050s central England could have irrigation needs similar to those currently seen in central and southern Europe. Mean monthly river flows could decrease by 50% to 80%. However, by the 2080s, the latest UK climate projections (UKCP09) are that there could be around three times as many days in winter with heavy rainfall (defined as more than 25mm in a day). It is plausible that the amount of rain in extreme storms (with a 1 in 5 annual chance, or rarer) could increase locally by 40%<sup>35</sup>. The impact of wetter winters and more of this rain falling in wet spells may increase river flooding. More intense rainfall causes more surface runoff, increasing localised flooding and erosion. In turn, this may increase pressure on drains, sewers and water quality. Storm intensity in summer could increase even in drier summers.

More generally, according to the UK's Climate Change Risk Assessment<sup>36</sup> the following key impacts associated with climate change are likely:

- ▶ Flood risk is projected to increase across the UK. Expected annual damages increase from a current baseline of £1 billion to between £1.8 and £5.6 billion by the 2080s for England (not including the effects of projected population growth);
- ▶ Risk of increased pressure on the country's water resources. The current public water supply surplus of around 900MI/day on average is projected to turn into a water supply deficit of around 1,250MI/day by the 2020s and 5,500MI/day by the 2050s, with large regional variations;
- ▶ Potential health risks related to hotter summer conditions, but potential benefits from milder winters;

---

<sup>34</sup> UKCP09 <http://ukclimateprojections.defra.gov.uk/content/view/515/499/>

<sup>35</sup> Birmingham City Council (2011) Preliminary Flood Risk Assessment

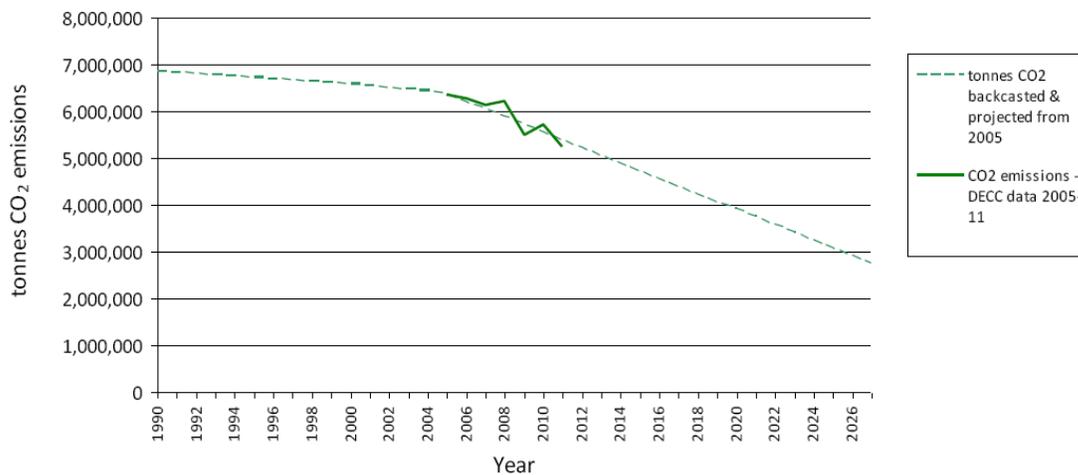
<sup>36</sup> [http://www.sustainabilitywestmidlands.org.uk/media/resources/adaptation\\_sub-committee\\_report.pdf](http://www.sustainabilitywestmidlands.org.uk/media/resources/adaptation_sub-committee_report.pdf)

- ▶ There are projected to be between 580 to 5,900 additional premature deaths per year by the 2050s in hotter summer conditions. Conversely, between 3,900 and 24,000 premature deaths are projected to be avoided per year with milder winters by the 2050s;
- ▶ Sensitive ecosystems that have already been degraded by human activity may be placed under increasing pressure due to climate change. The main direct impacts relate to changes in the timing of life-cycle events, shifts in species distributions and ranges, and potential changes in hydrological conditions. While some species would benefit from these changes, many more would suffer; and
- ▶ Some climate changes projected for the UK provide opportunities to improve sustainable food and forestry production. Some agri-businesses may be able to increase yields of certain types of crops and introduce new crops in some parts of the country, as long as pests and diseases are effectively controlled and sustainable supplies of water are available.

The UK is at risk of both water supply deficits (too little water) and greater risk of flooding (too much water). While this can seem counterintuitive, it arises due to changes in the timing and extent of when rain falls. Water supplies (groundwater and reservoirs) need sustained rainfall over a period of time, particularly in winter, to remain at required levels. The intense rain that can lead to flooding from rivers and surface water does not necessarily replenish these large stores, as the water may flow rapidly downstream before it is captured, and not fall in sufficient quantity over a prolonged period.

Birmingham imports in the region of 22,800GWhr of energy per year costing the city’s population and businesses over £1.5bn, with costs predicted to rise along with fuel prices over the coming years<sup>37</sup>. The Climate Change Strategic Framework<sup>38</sup> identifies that 46% of Birmingham’s CO<sub>2</sub> emissions come from industry, 33% from domestic energy and 21% from road transport. Between 2005 and 2011, there was a 12.5% decrease in per capita carbon emissions (Figure 4.2). The Birmingham Climate Change Framework provides a key target to produce a 60% reduction in carbon dioxide (CO<sub>2</sub>) emissions produced in the City by 2026. The overall actual and projected reduction in CO<sub>2</sub> emissions is illustrated in Figure 4.2 where a halving of emissions over the next ten years is anticipated.<sup>39</sup>

Figure 4.2 CO<sub>2</sub> Emissions Progress and Required Reduction Path



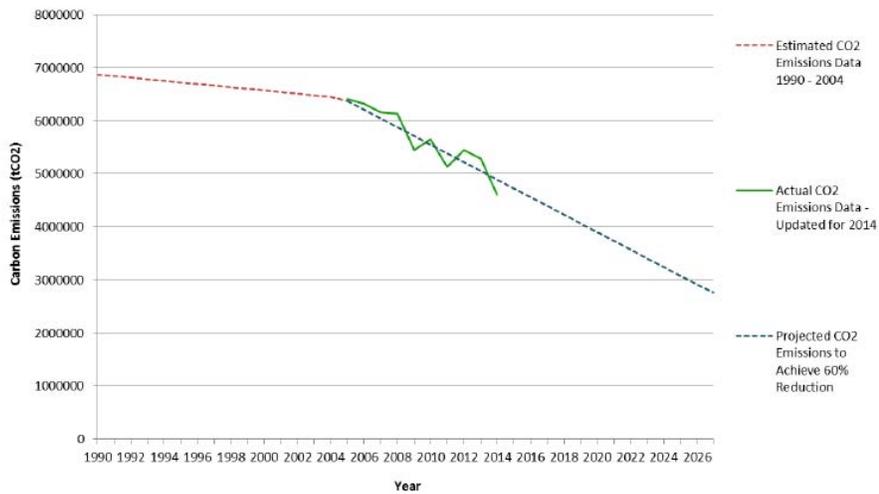
<sup>37</sup> Birmingham City Council website 'Renewable Energy'

<sup>38</sup> Birmingham City Council (2009) Cutting CO<sub>2</sub> for a Smarter Birmingham Strategic Framework

<sup>39</sup> Birmingham’s Green Commission (September 2013) Report on Birmingham’s Carbon Emissions Progress

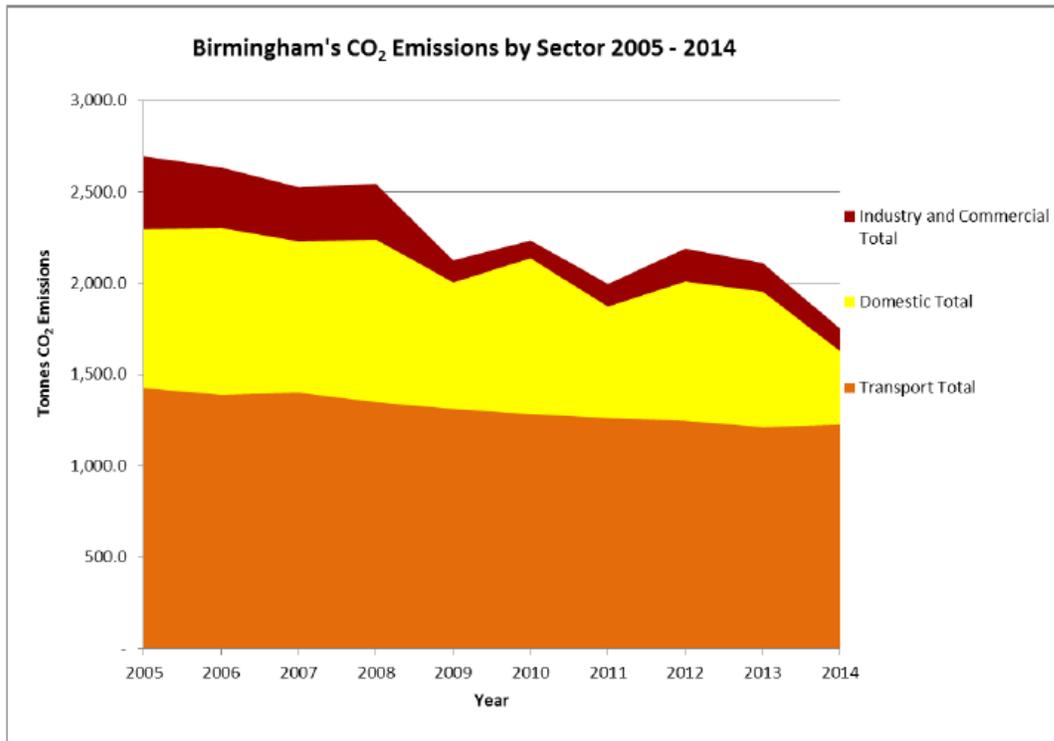
<http://greencity.birmingham.gov.uk/wp-content/uploads/2013/11/Birmingham-CO2-Emissions-Progress-September-2013.pdf>

**Birmingham Carbon Emissions 1990 - 2027 with Estimates, Actual Data and Projections**



In terms of sectoral emissions (Figure 4.3), the clearest contributions to overall reductions are associated with the industrial and domestic sectors, with transport proving to be more stubborn.

Figure 4.3 Birmingham's CO<sub>2</sub> Emissions by Sector 2005 – 2014



Birmingham's CO<sub>2</sub> Framework suggests that the City has limited scope for large-scale renewable energy projects; however, energy users can support developments elsewhere through their purchasing decisions. The largest renewable energy scheme currently operating in Birmingham is probably the Tyseley Energy from Waste Plant facility which produced a total of over 95,030.50 tonnes of ash between April 2010 and March 2011 and generates 25MWh per annum, from the thermal treatment of waste. A total of 80,241.22 tonnes of

bottom ash that was produced was sent for recycling in Castle Bromwich where metals are removed and recycled with the remaining material used within the construction industry. This is substantially short of the target for renewable energy to account for 15% of energy produced by 2020 in the Climate Change Strategy and Action Plan Consultation 2007. The City has a number of operational 'Combined Heat and Power' (CHP) facilities, such as Birmingham Children's Hospital and Aston University which are part of an award-winning CHP scheme, which are able to generate and supply heat and electricity for local consumption. The connection of Birmingham Children's Hospital to the CHP scheme has allowed for the supply of heat to Lancaster Circus.

Whilst it is acknowledged in the Annual Monitoring Report<sup>1</sup> that the Birmingham City Council currently does not monitor the provision of new renewable energy capacity, it is understood that further consideration is being given by Birmingham City Council to ways of monitoring additional renewable energy capacity installed through new development.

There are 100,000 dwellings in the city which are more than 80 years old according to the Birmingham Sustainability Strategy and Action Plan 2000-2005. As a result, the construction form is intrinsically energy-poor. Recent developments, such as the Birmingham High Performance Centre at the Alexander Stadium, have incorporated innovative, energy-efficient design. Although they are not referred to as 100% sustainable energy systems, CHP can be a more efficient energy system generating and supplying heat and electricity for local consumption.

Heating is by far the largest domestic use of energy in Birmingham. Space heating accounts for 62% of use, while water heating accounts 22%. This is exacerbated by a large number of homes that do not meet Decent Homes standards, including 49,250 City Council-owned homes and an estimated 35,000 private sector dwellings. The Climate Change Framework aims that by 2026 Birmingham will provide an improved quality and choice of housing and 'decent' standard for virtually all housing, with efficient heating systems and insulation in line with the best UK cities.

The Sustainable Community Strategy sets out a vision for Birmingham in 2026 to become the first sustainable global city in modern Britain. The strategy envisages that in 2026 Birmingham will lead on Climate Change with local energy generation from CHP and cooling schemes will reduce CO<sub>2</sub> emissions. If Birmingham is to become the first sustainable global city it needs to dramatically increase deployment in low carbon energy generation technologies. The UK has signed up to the European Renewable Energy Directive, which sets a target of 15% of all energy generated to be sourced from renewable sources by 2020.

### **Managing and Reducing Flood Risk**

Many of Birmingham's rivers and streams are susceptible to flooding (whether due to climate change or otherwise) and Birmingham City Council is required to consult the Environment Agency on all planning applications within the floodplain zones defined by the Agency.

Since 2011 the Environment Agency has provided advice on 212 approved planning applications including 97 in 2015/16. All of these applications were approved with no outstanding objection from the Environment Agency. In a number of cases an objection was raised to a proposal as initially submitted but, through amendments and discussions during the consideration of the application, issues were resolved and objections removed prior to the applications being approved.

The Level 1 revised Strategic Flood Risk Assessment was published in January 2012 by the City Council which assesses and maps all known sources of flood risk including fluvial, surface water, sewer, groundwater and impounded water bodies, taking into account future climate change predictions, to be used as an evidence base to locate future development, primarily in low flood risk areas. The Level 2 Strategic Flood Risk Assessment (April 2012) assesses possible development locations identified in the Strategic Housing Land Assessment in terms of flood zones and the sequential test. The results of the SFRA should be incorporated into the SA process once they become available.

One factor that can help to manage and adapt to the impact if climate change is the development and enhancement of Green Infrastructure (GI) (also including 'blue infrastructure'). GI is the interconnected network of open spaces and natural areas, such as greenways, waterway and waterbodies, parks, forest preserves and native plant vegetation, that can help naturally manage storm water, reduce flooding risk and improve water quality, helping to reduce the City's 'heat island effect'.

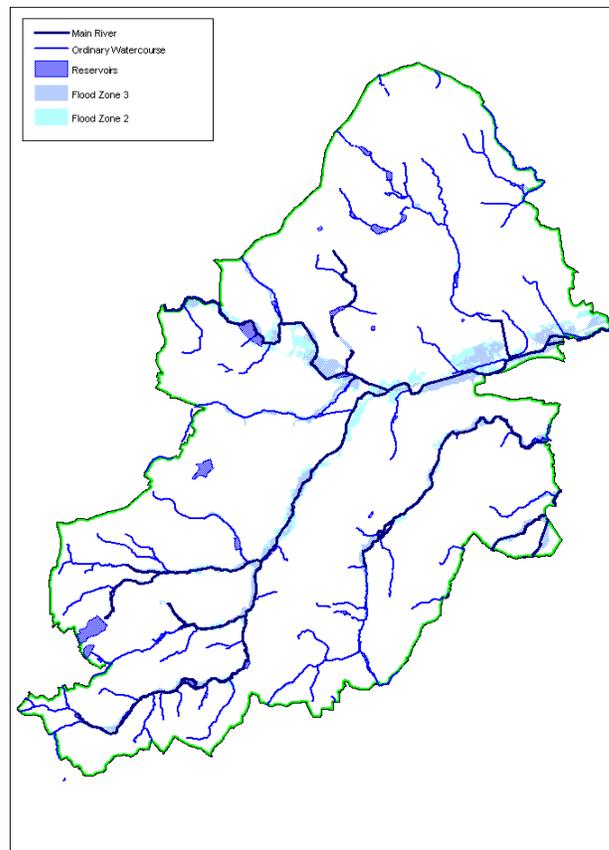
Birmingham is at risk of flooding from Main Rivers, ordinary watercourses, surface water, sewer flooding and groundwater. There is also the potential for canal and reservoir breach and overtopping. It is estimated that there are 11,365 at risk of fluvial flooding and 24,600 properties at risk of surface water flooding.

The Level 1 revised Strategic Flood Risk Assessment (SFRA) was published in January 2012 by Birmingham City Council. The SFRA assesses and maps all known sources of flood risk including fluvial, surface water, sewer, groundwater and impounded water bodies, taking into account future climate change predictions, and these are to be used as an evidence base to locate future development, primarily in low flood risk areas. The Level 2 Strategic Flood Risk Assessment (April 2012) assesses possible development locations identified in the Strategic Housing Land Assessment in terms of flood zones and the sequential test. Emerging strategies at the City-wide level to manage flood risk include the Surface Water Management Plan and the Local Flood Risk Management Strategy.

### Fluvial Flood Risk

Fluvial flooding occurs when water draining from the surrounding land exceeds the capacity of a watercourse. The Environment Agency produced Flood Zones show the areas potentially at risk of flooding from rivers, ignoring the presence of defences. Figure 4.4 shows the flood zones in Birmingham showing 1 in 100 and 1 in 1,000 year risks associated with Birmingham's rivers and their tributaries.

Figure 4.4 Flood Zones across Birmingham



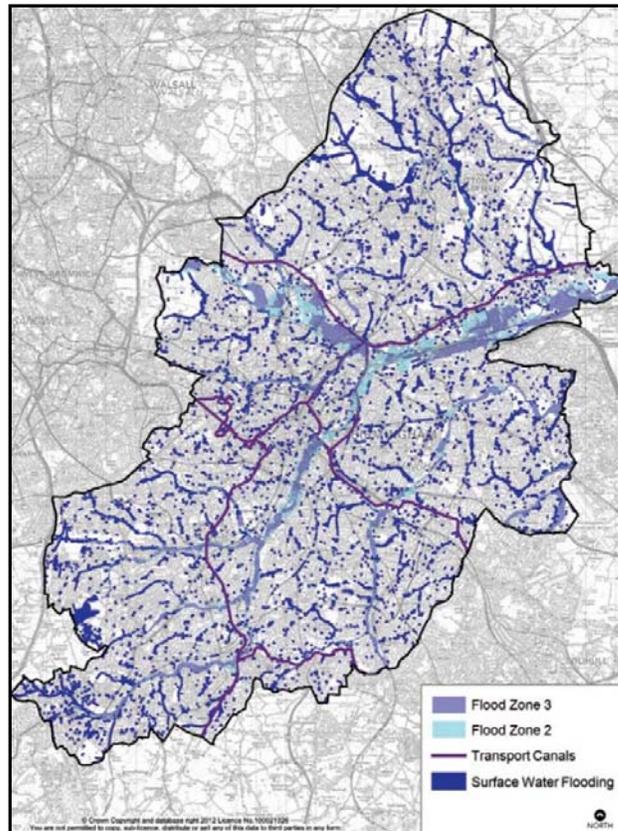
## Surface Water Flooding

Surface water flooding describes flooding from sewers, drains, small watercourses and ditches that occurs during heavy rainfall in urban areas. It includes:

- ▶ Pluvial flooding - flooding as a result of high intensity rainfall when water is ponding or flowing over the ground surface (surface run-off) before it enters the underground drainage network or watercourse, or cannot enter it because the network is full to capacity;
- ▶ Sewer flooding<sup>40</sup> - flooding which occurs when the capacity of underground systems is exceeded, resulting in flooding inside and outside of buildings. Normal discharge of sewers and drains through outfalls may be impeded by high water levels in receiving waters;
- ▶ Flooding from small open-channel and culverted urban watercourses<sup>41</sup> which receive most of their flow from inside the urban area; and
- ▶ Overland flows from the urban/rural fringe entering the built-up area, including overland flows from groundwater springs.

Birmingham City Council has developed a Surface Water Management Plan<sup>42</sup>. The SWMP process is a framework through which key local partners with responsibility for surface water and drainage in their area work together to understand the causes and effects of surface water flooding and agree the most cost-effective way of managing surface water flood risk for the long term. The process of working together as a partnership is designed to encourage the development of innovative solutions and practices. The purpose is to make sustainable urban surface water management decisions that are evidence based, risk based, future proofed and inclusive of stakeholder views and preferences. Figure 4.5 illustrates the areas susceptible to surface water flooding across the City.

Figure 4.5 Areas Susceptible to Surface Water Flooding



Source: Birmingham City Council (May 2013) Green Spaces Living Plan

<sup>40</sup> Consideration of sewer flooding in 'dry weather' resulting from blockage, collapse, or pumping station mechanical failure is excluded from SWMPs as this is for the sole concern of the sewerage undertaker

<sup>41</sup> Interactions with larger rivers and tidal waters can be an important mechanisms controlling surface water flooding

<sup>42</sup> <https://www.birmingham.gov.uk/downloads/file/2561/surface-water-management-plan-for-birmingham-final-report>

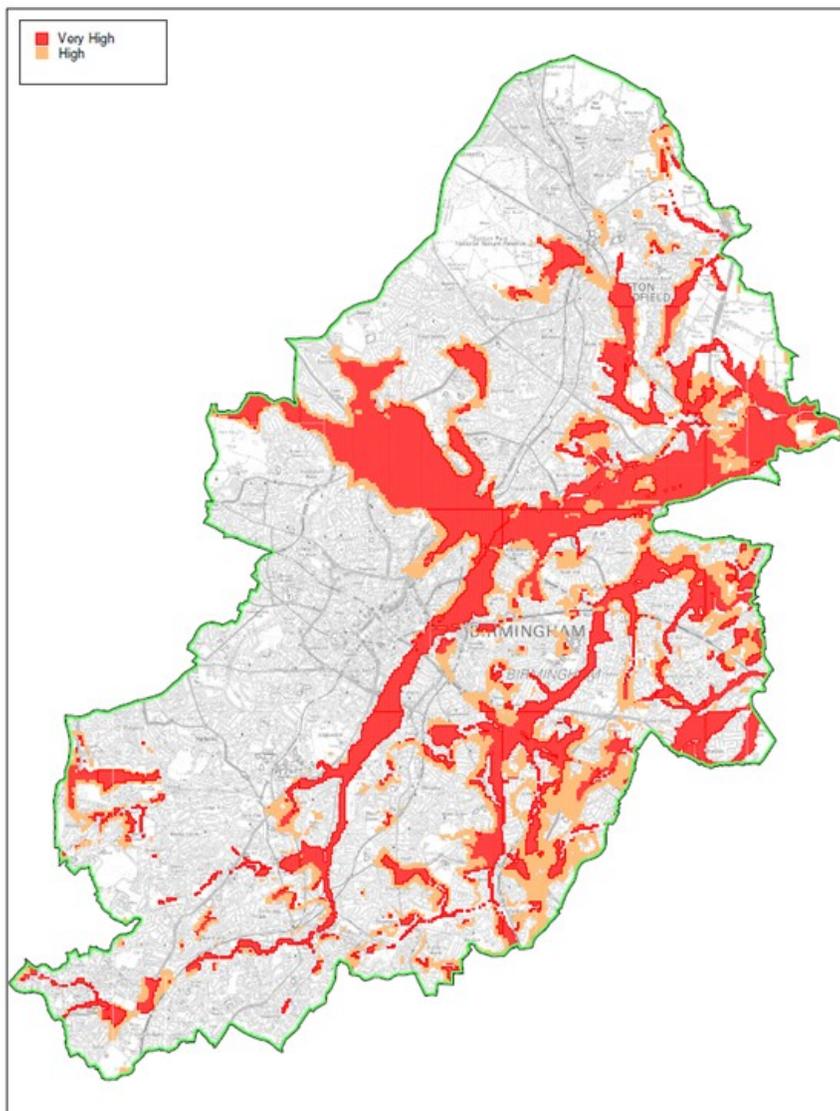
## Groundwater Flood Risk

In response to the need for more information on groundwater flooding, the British Geological Society (BGS) has produced the first national hazard or susceptibility data set of groundwater flooding. The data is based on geological and hydrogeological information and can be used to identify areas where geological conditions could enable groundwater flooding to occur and where groundwater may come close to the ground surface.

Although this is not a risk data set in that it does not provide information about the likelihood of a groundwater flood occurring, it can be used to provide an understanding of groundwater flooding.

Areas susceptible to groundwater flooding are shown Figure 4.6.

Figure 4.6 Areas Susceptible to Groundwater Flooding



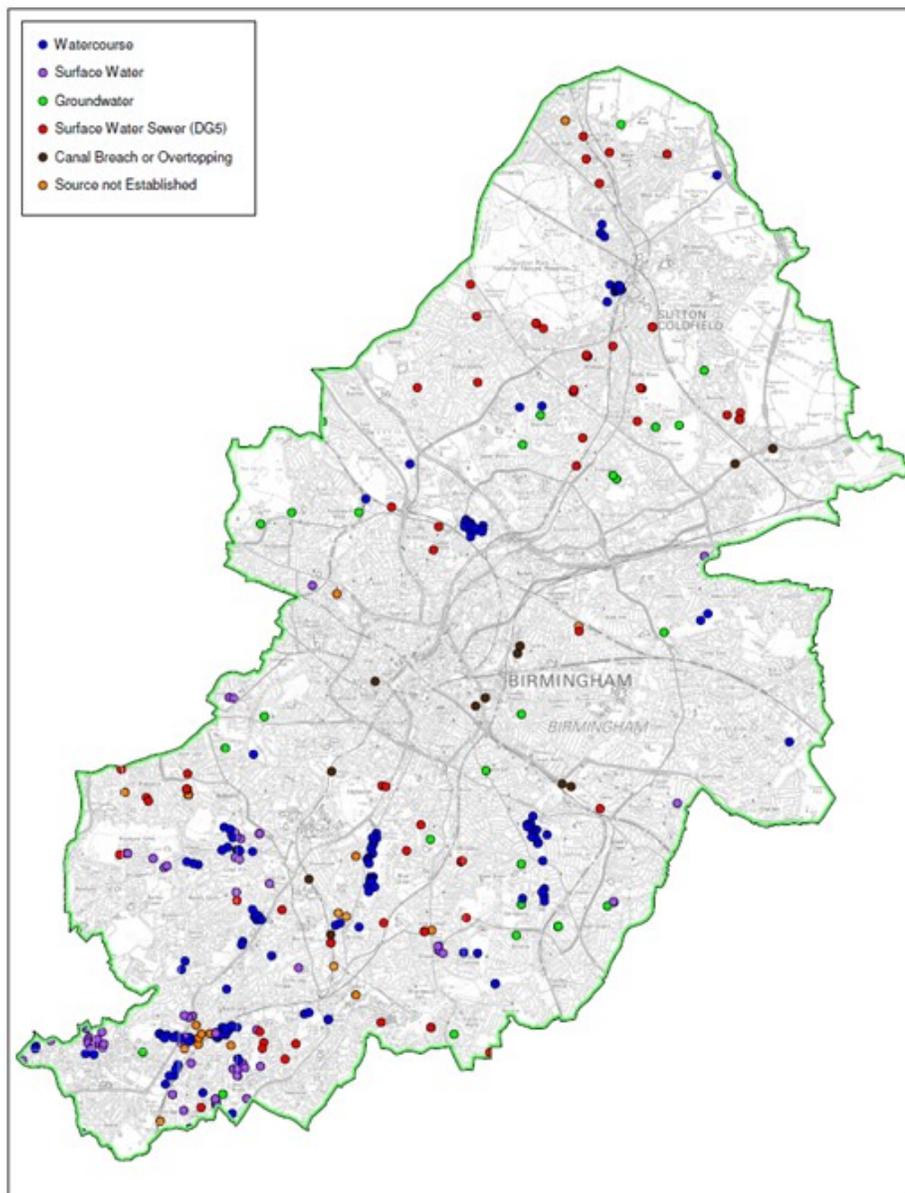
Source: Birmingham City Council (May 2011) Preliminary Flood Risk Assessment

## Historic Flood Risk in Birmingham

A number of datasets have been collated to assess the local historic flood risk in Birmingham; this includes flooding from watercourses, surface water and groundwater. However due to the urbanised nature of the Birmingham catchment there are often significant interactions between sources of flooding and it is not always possible to ascertain the source of the flooding.

Historical flooding records provide a source of data that directly indicates both areas and sources of flooding. Recent years have seen a number of flooding events affecting Birmingham (September 1998, April 1999, June 1999, July 2000, June 2005, June 2007, July 2007, September 2008 and more recently in June 2016 and in May 2018), all historical flooding data has been collected from BCC, Severn Trent Water and British Waterways. The PFRA mapped historic flood locations across the City, shown in Figure 4.7.

Figure 4.7 Historic Flood Locations across Birmingham by Flooding Source



Source: Birmingham City Council (May 2011) Preliminary Flood Risk Assessment

### **Influence of the DM DPD on Climate Change and Managing and Reducing Flood Risk**

There are opportunities to adopt more sustainable approaches to directly address potential increases extreme weather events which may arise through climate change. Scrutiny of building design could include climate-proofing measures such as passive ventilation and opportunities to enhance energy efficiency which will indirectly assist in mitigating climate change. The extension and enhancement of Green Infrastructure across the City will be important in providing necessary resilience against the likely impacts of climate change. The DM DPD will directly influence where development takes place through guiding development away from flood risk areas, requiring appropriate adaptation measures where this is not possible, and enhancing the City’s capacity to mitigate and adapt to the likely effects of climate change.

### **Biodiversity and Geodiversity**

The City has a number of areas that are protected for their nature conservation value. The City’s nature conservation sites include two Sites of Special Scientific Interest (SSSIs): Sutton Park and Edgbaston Pool. Sutton Park is also designated as a National Nature Reserve (NNR). There are 12 Local Nature Reserves (LNRs), over 50 Sites of Importance for Nature Conservation (SINCs) and over 120 Sites of Local Importance for Nature Conservation (SLINCs) covering various ancient woodlands, grasslands, lakes, streams, and other important wildlife habitats or examples of natural landscape. Within the City Centre there are a number of sites of local importance for nature conservation (SLINCs), essentially the canal network and the River Rea. These areas, as well as the linear corridors along main rail and Metro lines, are key wildlife corridors. Together these form the City’s green and blue infrastructure network through a series of corridors and stepping stones which, in accordance with the NPPF (para 109) should be protected and enhanced to increase their resilience to current and future pressures. Table 4.4 shows the total area covered by different types of nature conservation sites, Figure 4.8 maps these assets.

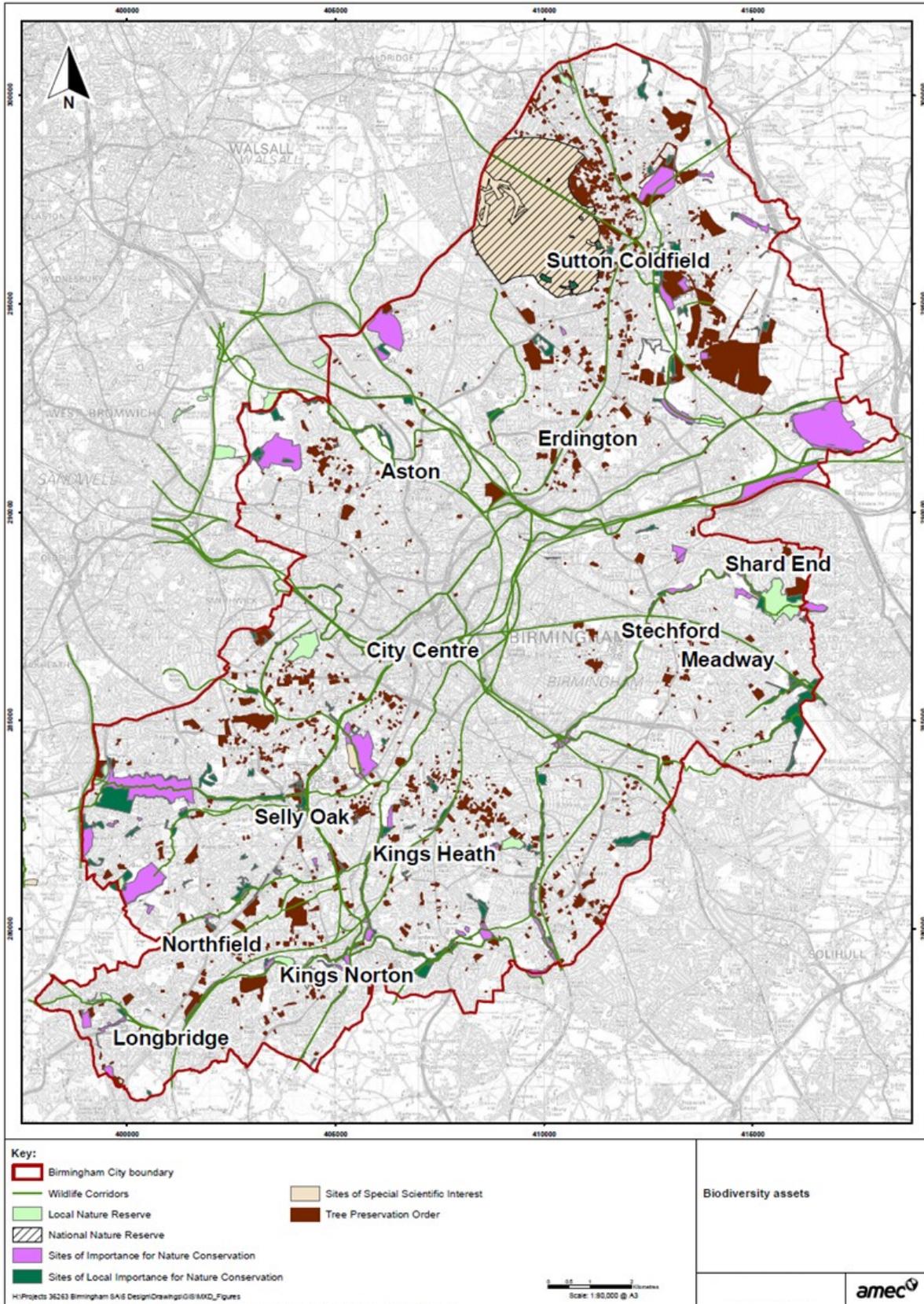
**Table 4.4** Birmingham’s Designated Nature Conservation Sites

Type of Area	Number of Sites	Total Area (Hectares)	% of City’s Area
SSSIs	2	896.59	3.35
NNRs	1	811.73	3.03
LNRs	12	316.73	1.16
SINCs	55	828.03	3.09
SLINCs	121	698.96	2.62

Source: Birmingham City Council, AMR (2013 and 2014)

The 2016-2017 AMR reports only very limited changes to designated sites as a result of planning applications, with one application approved for development within designated sites of national importance (SSSIs or NNRs). Some 43 applications for development were approved for development in or adjacent to SINCs: for these schemes where adverse impacts on sites’ nature conservation interests were anticipated, appropriate mitigation and compensation were secured to satisfactorily address these impacts.

Figure 4.8 Birmingham's Biodiversity Assets



Green Infrastructure (GI) refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to cover benefits provided by trees, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands<sup>43</sup>. GI can provide a number of benefits including:

- ▶ Safeguarding and enhancing natural and historic assets;
- ▶ Increasing contact between people and nature;
- ▶ Protecting and enhancing landscape character and local distinctiveness;
- ▶ Providing for climate change mitigation and adaptation;
- ▶ Creating a focus for social inclusion, education, training, health and well-being;
- ▶ Increasing property and land values; and
- ▶ Attracting and retaining people ensuring stable populations and labour supply.

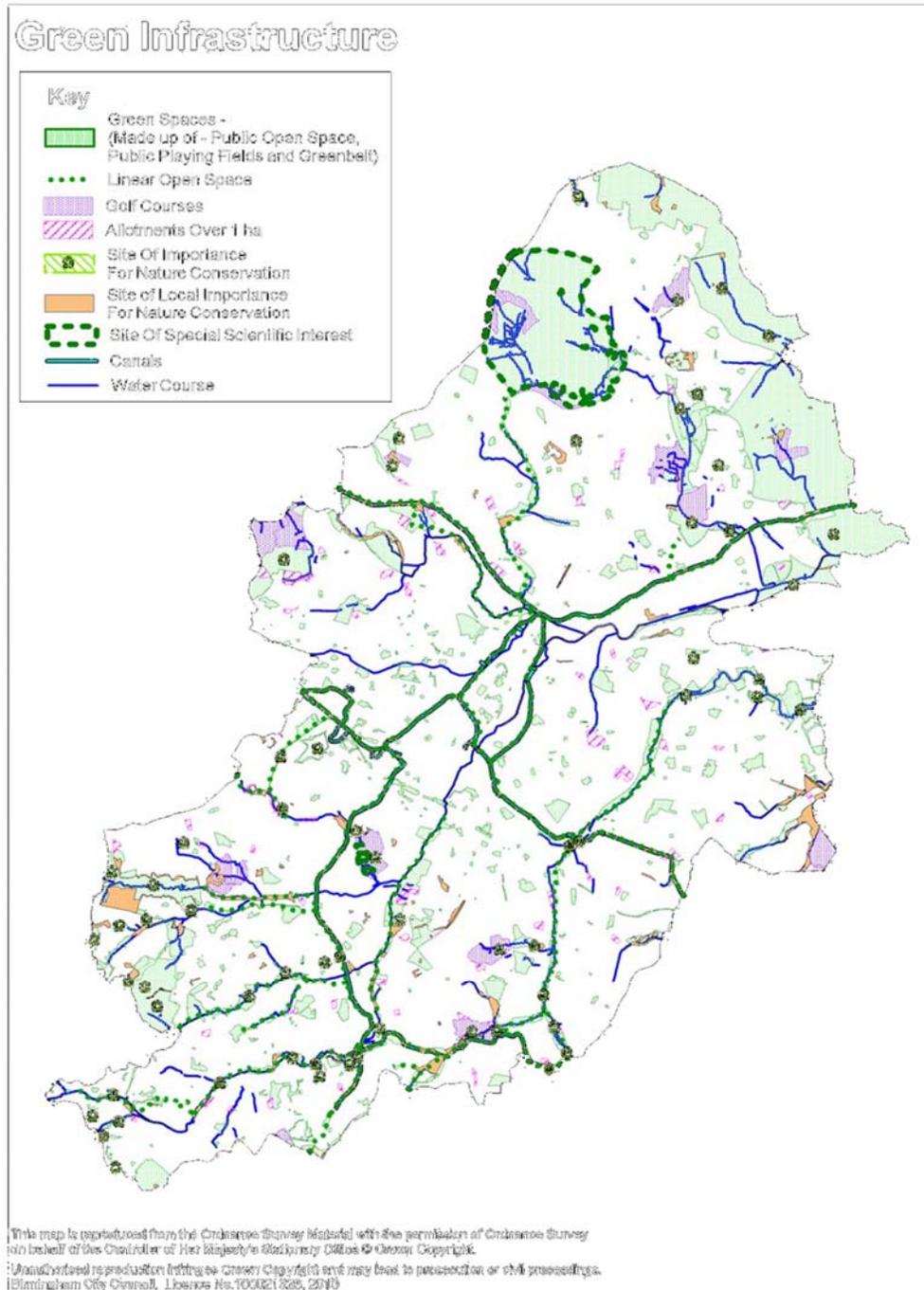
The Birmingham and Black Country Nature Improvement Area (NIA) Ecological Strategy provides a landscape-scale framework for action to conserve and enhance biodiversity and geodiversity and to improve ecological networks across the City. The approach set out in the Strategy reflects ecological principles set out in *Making Space for Nature* (Lawton *et al* 2010) and national policy and guidance relating to the natural environment and green infrastructure. The Cannock Chase to Sutton Park Project encompasses an area of approximately 670 square km extending from the edge of Birmingham northwards into Staffordshire. The Project area is characterised by two core areas of semi-natural habitat: Cannock Chase and Sutton Park. These areas support significant amounts of lowland heath habitat along with a range of additional habitats including acidic and neutral grasslands, scrub, woodland and wetlands. The City's ecological networks are a fundamental component of Birmingham's Green Infrastructure and in accordance with paragraphs 91, 150 and 171 of the NPPF should inform policy and its implementation to ensure that development that may affect them is compatible with their purpose and can contribute to their enhancement. The Council's Green Living Spaces Plan recognises the essential role of the green infrastructure network in securing a resilient and healthy city and provides a framework for increasing natural capital and the ability of green infrastructure assets to deliver environmental and socio-economic benefits.

Figure 4.9 illustrates the City's GI network

---

<sup>43</sup> Defra (2011) *The Natural Choice: securing the value of nature*.

Figure 4.9 Birmingham's Green Infrastructure Network



Source: <http://consult.birmingham.gov.uk/portal/ps/csd/csdraft?pointId=d2670232e7333>

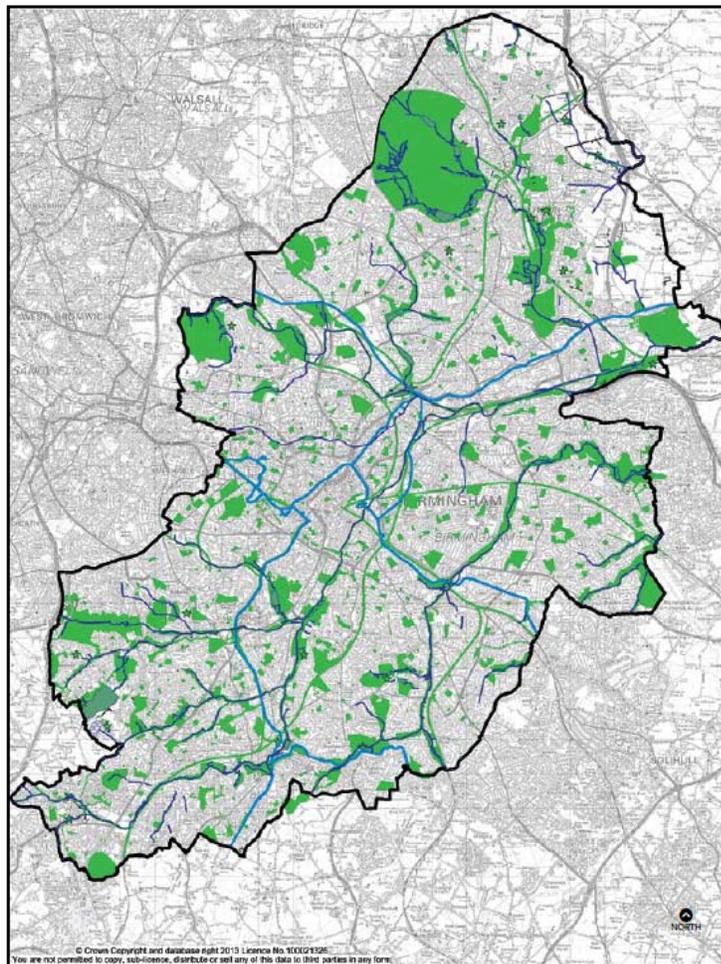
Birmingham is characterised by a large number of well-established parks, many of which were created in the 19th century. The City's greenspace is supplemented by a large linear open space network, which is based primarily on the Rivers Cole and Rea and the City's extensive canal network. The extent of green spaces (excluding areas designated for nature conservation) is shown in Table 4.5 and are mapped in Figure 4.10.

Table 4.5 Green Spaces in Birmingham

Open Space Category	Area (ha)	% of City Council Area
Public Open Space	3,069.77	11.46
Public Playing Fields	296.9	1.11
Private Playing Fields	268.11	1.0
Private Open Space	67.19	0.25
Educational Playing Fields	166.33	0.62
Golf Courses	657.78	2.46
Statutory Common Land	11.25	0.04
Allotments	243.8	0.91
Green Belt	4,154.77	15.52

Source: Birmingham City Council, AMR (2015)

Figure 4.10 Green Spaces in Birmingham



Source: <http://consult.birmingham.gov.uk/portal/ps/csd/csdraft?pointId=d2670232e7333>

## Geodiversity

The term geodiversity incorporates all the variety of rocks, minerals and landforms and the processes which have formed these features throughout geological time. The geology of the West Midlands is dominated by the South Staffordshire Coalfield, the exploitation of which has contributed greatly to the industrial and economic development of the area<sup>44</sup>. Upper Carboniferous Coal Measures underlie the main conurbation of Wolverhampton, Walsall, West Bromwich and Dudley. Surrounding these shales, sandstones and mudstones are Triassic aged rocks which comprise red mudstones and sandstones. These underlie much of Birmingham and form the solid geology up to Sutton Coldfield. Within the main mass of the Coal Measures are a number of isolated outcrops of older Silurian rock. These shallow water limestones and shales contain a wide range of marine fossils and form the famous outcrops at Wren's Nest and Dudley Castle Hill. There are also a number of igneous intrusions into the Coal Measures. Much of the area has been mantled in thick deposits of boulder clay and sands and gravel deposited by ice sheets and meltwaters during the Ice Ages of the last two million years<sup>45</sup>.

The geology underlying the City has a significant influence over the use of SuDS which include a variety of techniques including swales and basins, permeable pavements and ponds and wetlands to mimic natural drainage processes and mitigate the impacts that development has on surface water runoff rates and volumes. The SFRA for Birmingham (2011) notes that the geology beneath Birmingham, is essentially divided into two due to a fault, known as the 'Birmingham Fault', running approximately north-east to south-west and consists of Permian and Triassic sandstones and mudstones. To the west of the fault line the rock strata predominantly consists of red and red-orange sandstones and is indicative of high permeability soils (good to very good drainage), and to the east the rock strata predominately consists of red and red-brown mudstones which are inter-bedded by several silt and sandstone bands and are typically representative of low permeability soils (poor drainage to practically impervious). The SFRA encourages that these characteristics should be considered in the development process where large increases in impermeable area for a site could contribute to a significant and resulting increase in surface water runoff peak flows and volumes. In turn this could contribute to an increase in flood risk elsewhere unless adequate SuDS techniques are implemented as part of a development. Additionally, indirect impacts on the water table and source protection zones need to be taken into account.

### Influence of the DM DPD on Biodiversity and Geodiversity

Policies and proposals pursued in the DM DPD could include a range of direct and indirect impacts, all having the potential to adversely affect biodiversity. Careful scrutiny of development proposals will be required to ensure that direct impacts are avoided where possible and indirect impacts (such as downstream effects) are anticipated and appropriately mitigated. If well managed, development can benefit wildlife and recreational interests, through habitat improvement or creation using the Green and Blue infrastructure multifunctional network as a starting point. This accords with guidance in the NPPF (para 118) which requires the application of the 'avoid, then mitigate and, (as a last resort) compensate for adverse impacts on biodiversity' principle. Given the need to minimise impacts on biodiversity, DM DPD policies and their application should promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets (in accordance with the NPPF para 117). For geodiversity, there is a need to conserve, interpret and manage geological sites and features in the wider environment, and not just designated sites.

---

<sup>44</sup> [http://www.naturalengland.org.uk/ourwork/conservation/geodiversity/englands/counties/area\\_ID38.aspx](http://www.naturalengland.org.uk/ourwork/conservation/geodiversity/englands/counties/area_ID38.aspx)

<sup>45</sup> [http://www.naturalengland.org.uk/ourwork/conservation/geodiversity/englands/counties/area\\_ID38.aspx](http://www.naturalengland.org.uk/ourwork/conservation/geodiversity/englands/counties/area_ID38.aspx)

## Population and Human Health

### Housing

Birmingham’s 2017 housing strategy states that: “Every citizen should have the opportunity to live in a safe and warm home within a neighbourhood they are proud of”. The strategy outlines the importance of tackling fuel poverty to improve health, well-being and financial inclusion. This is highlighted as a cross-cutting issue within the Council’s Vision and Priorities statement. The strategy also makes reference to the well-established “Stay Warm Stay Well” (SWSW) programme that delivers practical solutions to vulnerable people affected by fuel poverty. This programme is delivered through a network of third sector partners. The Council has an ambition to extend an offer of affordable warmth works to private sector households within the areas where ECO-funded improvement works are being carried out on Council-owned homes.

The City covers an area of 26,779ha (267.8km<sup>2</sup>), of which 15,200ha is residential. According to the Housing Development Plan<sup>46</sup> Birmingham’s residents live in 406,000-410,000 households. The City has about 414,000 self-contained properties. In April 2018, there were about 61,000 Council owned properties and an estimated 37,650 owned by registered social landlords. In addition to this there are also 3,000 shared ownership properties. Since 2001, the City’s population has grown after experiencing declines between 1991 and 2001 due to net out-migration. The current population of the City (according to ONS population estimates) is 1,218,100. If recent trends continue the population of Birmingham is projected to grow from 1,101,400 in 2014 to 1,189,600 (+8.0%) in 2024 and to 1,268,100 (+15.1%) in 2034 (sub national population projections)<sup>47</sup>. Substantial growth is expected among pensioners particularly those aged 85 years or more. This age group is expected to increase by almost 25% by 2024. The gains reflect a shift in the overall balance of migration from negative to positive, coupled with greater natural increases. The main reason for this has been the high levels of international immigration in recent years. The growth in the ageing population is reflective of national trends. These statistics have implications for housing provision. Table 4.6 shows that the number of households in the City increased in the period from 2001 to 2011. Despite the above, the rate of increase in households in Birmingham has been less than the national and regional rates.

Table 4.6 Change in Households in Birmingham, the West Midlands Region and England, 2001 and 2011

Area	2001 Households	2011 Households
Birmingham	390,800	410,700
West Midlands Region	2,153,700	2,294,900
England	20,451,400	22,063,400
Index of Change		
Birmingham		+0.95
West Midlands Region		+0.93
England		+0.92

Source: Census of Population, 2001 and 2011, Office of National Statistics

<sup>46</sup> Source:

<http://www.birmingham.gov.uk/cs/Satellite?c=Page&childpagename=Housing%2FPageLayout&cid=1223092723273&pagename=BCC%2FCommon%2FWrapper%2FWrapper>

<sup>47</sup> Statistics from [https://www.birmingham.gov.uk/info/50065/population\\_and\\_census/1003/population\\_in\\_birmingham/6](https://www.birmingham.gov.uk/info/50065/population_and_census/1003/population_in_birmingham/6) [Accessed April 2018]

If recent trends continue the population of Birmingham is projected to grow from 1,101,400 in 2014 to 1,189,600 (+8.0%) in 2024 and to 1,268,100 (+15.1%) in 2034. Substantial growth is expected among pensioners particularly those aged 85 years or more. This age group is expected to increase by almost 25% by 2024.

Forecast organic population growth equates to just under 40,000 new residents over the next five years. Birmingham is forecast to see growth in the number of households from 422,022 in 2014 to 440,529 – a rise of around 18,500 households. This equates to an average annual increase of approximately 3,680<sup>48</sup> households each year. Longer term forecasts<sup>49</sup> show that the number of households will increase by over 100,000 over the next 20 years.

The average household size in Birmingham is greater than the national average and is greatest in the West Midlands Region according to the 2011 Census with an average household size of 2.6 people. Birmingham has relatively high proportions of households containing one person or with five or more people. Average household size reduced from 2.54 in the period 1991 to 2001, largely as a result of growing numbers of one-person households. However, for the period of 2011 to 2011 the average household size (persons) has increased to 2.56<sup>50</sup>. The City has a relatively low proportion of detached housing, and higher proportions of terraced housing and flats.

According to the 2011 Census, Birmingham was the most densely populated local authority within the West Midlands region with 4,000 people per square kilometre. This is an increase on the 2011 population density of 3,677 people per square kilometre which equates to an increase of 0.9%. The average housing density has decreased from over 74 dwellings in 2009/10 to just over 40.6 dwellings per hectare in 2014/15. This could be attributed to factors such as the reluctance of the development industry to commit to apartment schemes at the present time.

In recent years there have been political concerns over high density suburban development. This has manifested itself in a *'Mature Suburbs: Guidelines to Control Residential Intensification - Supplementary Planning Document'* and away from the City Centre this has led to decreasing densities over the past five years.

The mean house price in the City is below the regional average, particularly at the cheaper end of the market. Figure 4.11 indicates that house prices in Birmingham peaked in January 2008 and sharply declined through to 2010, and now have recovered strongly to over one third higher in 2018 than 15 years ago at almost £180,000. Over the same period sales volumes initially declined but have recovered to levels of 15 years previously. Overall, the figures suggest that the affordability of housing for poorer families and first-time buyers has declined. 89,000 new homes are needed from 2011 to 2031. Whilst it is not possible to deliver all of this new housing within the city boundary, Birmingham council have ambitious but achievable plans to build at least 51,000 new homes in this period.

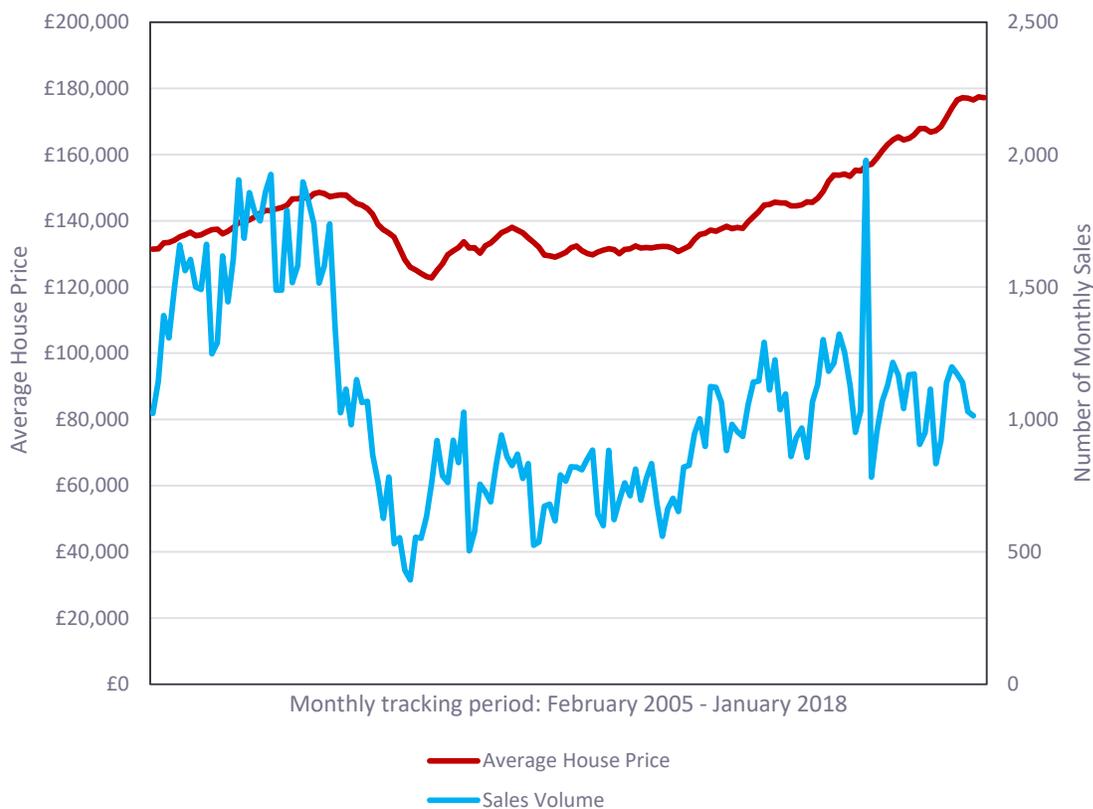
---

<sup>48</sup> Figures from ONS

<sup>49</sup> ONS 2039 Household Projections

<sup>50</sup> Office for National Statistics 2011 Census: Population and household estimates for England and Wales – supplementary figures Pt 2

Figure 4.11 Average House Prices and Sales Volume in Birmingham 2005-2018<sup>51</sup>



Birmingham has a relatively high proportion of households renting from Birmingham City Council. Statistics from the Housing Strategy Statistical Appendix 2011 show that within Birmingham the number of local authority rented housing is 61,000 and Registered Social Landlord housing is 37,650 which collectively equates to 25.6% of the total housing supply or the local authority.

There is a mismatch between the existing supply of affordable housing and the location of demand. There is continued demand for affordable housing in Birmingham. The most recent City wide Strategic Housing Market Assessment (SHMA)<sup>52</sup> found that approximately 38% of the City’s overall housing requirement is for affordable housing. The Birmingham Development Plan will help to address some of this demand.

The Birmingham Housing Plan (2010 Review) identifies that the vast majority of Birmingham’s City Council housing meets the Decent Homes standard. In the private sector, Birmingham has a substantial number of older homes that are in need of repair and modernisation. As of April 2018, the new minimum energy efficiency standard (MEES) regulations will come into action. The new standard requires landlords of privately rented domestic (PRS) and non-domestic property in England or Wales to ensure that their properties reach at minimum Energy Performance Certificate (EPC) rating of E before granting a new tenancy to new or existing tenants<sup>53</sup>. If a property does not meet EPC standard E, landlords are obligated to carry out any works under the value of £2,500 to bring the property up to standard. Special exemptions may apply, for example if the building is listed. There are clear links between the condition of housing and human health. For

<sup>51</sup> Land Registry (2018) <http://www.landregistry.gov.uk/public/house-prices-and-sales/search-the-index>

<sup>52</sup> Available at [https://www.birmingham.gov.uk/downloads/download/359/strategic\\_housing\\_market\\_assessment\\_2013](https://www.birmingham.gov.uk/downloads/download/359/strategic_housing_market_assessment_2013) [Accessed April 2018]

<sup>53</sup>

example, research<sup>54</sup> undertaken by Birmingham University showed that there is a clear relationship between excess winter deaths, especially of older people, cold housing and low energy efficiency.

Birmingham has benefitted from 1,944 net dwelling completions and 111 vacant dwellings being returned to use in 2016/17 which totalled over 2,000<sup>55</sup> new dwellings being added to the housing stock. This was lower than the 2015/16 period (3,113) but higher than the four preceding years.

Historically, homeless applications in Birmingham have been twice the national average; although they are declining. There were 19,496 applicants for housing on the Local Authority Housing Register as at 01 April 2013. Increasingly, older and disabled people

Birmingham City Council understands that Trading Standards will be leading on the primary delivery and prosecution process associated with MEES. BCC's Private Rented Services Regulation & Enforcement team have a good working relationship with the people who wish to remain in their own homes. This results in strong demand for property adaptations, and an implication of need for to build homes to 'lifetime' standards. There were 1,899 referrals for assistance from Birmingham City Council in 2011/12. Demand for housing still remains strong albeit that there was a fall from over 28,000 households on the register to just over 20,000 in 2015/16. The overall total as at April 2016 stood at 20,292.

Every year, housing partners across the city ensure that thousands of households who are homeless, or at high risk of homelessness, are provided with shelter and a pathway into settled accommodation. For 2015/16 this included 5,578 households assisted through the statutory homeless system as well an additional 7,824 households whose homelessness was prevented or relieved by Council delivered services or commissioned services delivered by partners. In addition, there are many other agencies active in the city who provide advice and assistance to people in housing crisis.

In 2016 Birmingham undertook a homelessness review<sup>56</sup> which included examining the extent, nature and causes of homelessness in the City. One of the key findings from this review is that there are an estimated 20,000 households in Birmingham each year who are homeless. This study also highlighted that there are more than 20,000 households on the BCC housing register (as at April 2016) so there is significant demand for Council housing.

Birmingham still manages its own stock and, notwithstanding Right to Buy, there remain very significant areas of predominantly local authority housing. These areas are however clustered and there are indeed significant pockets of the City (e.g. Edgbaston and Sutton) where affordable housing is in lesser supply and average houses prices are the highest in the City.

## Economy

Birmingham's economic prosperity was originally built on manufacturing, but changes in the 1970s and 1980s led to a massive decline in this sector. However, highly-skilled, specialist manufacturing remains important to the city. Birmingham has since developed a substantial business and financial services sector through the transformation and growth of the City Centre and has become a major employment centre drawing in workers from across the West Midlands. It is an economic cluster with a particular focus on the banking, finance and insurance and distribution, hotels and restaurants and public service sectors. Birmingham is now a major centre for business conferences.

Despite declines in manufacturing, Birmingham is still a major employment centre drawing in workers from across the West Midlands region. Table 4.7 shows the number of economically active people within

<sup>54</sup> <https://www.birmingham.ac.uk/Documents/college-social-sciences/social-policy/SPSW/Housing/2016/good-housing-better-health-2016.pdf> [Accessed April 2018]

<sup>55</sup> All figures from 2016/17 Authority Monitoring Report [Accessed April 2018]

<sup>56</sup> Birmingham City Council Homelessness Review 2016/17 Available at [https://www.birminghambeheard.org.uk/people-1/birmingham-homelessness-prevention-strategy-2017/supporting\\_documents/Birmingham%20Homelessness%20Review%202016%20FINAL.pdf](https://www.birminghambeheard.org.uk/people-1/birmingham-homelessness-prevention-strategy-2017/supporting_documents/Birmingham%20Homelessness%20Review%202016%20FINAL.pdf) [Accessed April 2018]

Birmingham, and Table 4.8 shows the number of employed residents in Birmingham by Gender and Ethnic Group.

Table 4.7 Economically Active Residents (2017)<sup>57</sup>

	Birmingham (numbers)	Birmingham (%)	West Midlands (%)	Great Britain (%)
<b>All People</b>				
Economically active	500,900	69.4	76.4	78.4
In employment	458,900	63.6	72.4	74.9
Employees	391,500	54.3	62.4	64.0
Self employed	65,900	9.1	9.7	10.6
Unemployed	42,100	8.4	5.4	4.5
<b>Males</b>				
Economically active	275,000	76.9	82.0	83.4
In employment	250,000	69.9	77.5	79.6
Employees	200,900	56.2	63.9	65.2
Self employed	49,100	13.7	13.4	14.1
Unemployed	25,000	9.1	5.5	4.6
<b>Females</b>				
Economically active	225,900	62.1	70.9	73.4
In employment	208,900	57.4	67.2	70.3
Employees	190,600	52.4	60.9	62.7
Self employed	16,800	4.6	6.0	7.2
Unemployed	17,100	7.6	5.2	4.3

Table 4.8 Employed Residents in Birmingham by Gender and Ethnic Group<sup>58</sup>

	2013		2014		2015		2016		2017	
	Number	Rate								
Male	228,100	66.4	236,000	68.2	240,500	68.8	256,000	72.1	250,000	69.9
Female	179,700	51.6	198,500	55.9	194,500	54.3	197,200	54.8	208,900	57.4
White	261,100	67.4	290,600	67.5	306,200	69.1	272,400	73.1	283,400	71.7
Ethnic Minority	145,300	48.1	143,900	53.4	128,700	48.8	180,800	52.8	174,700	54.0

At 63.6%, Birmingham's employment rate is well below both the corresponding regional (72.4%) and national rate (74.9%). The female employment rate for Birmingham (57.4%) is much lower than the male rate (66.9%)

<sup>57</sup> [ONS Annual Population Survey](#)

<sup>58</sup> ONS Annual Population Survey

and both are lower in Birmingham than the national averages; for women there is a 12.9 point difference from the rate for Great Britain.

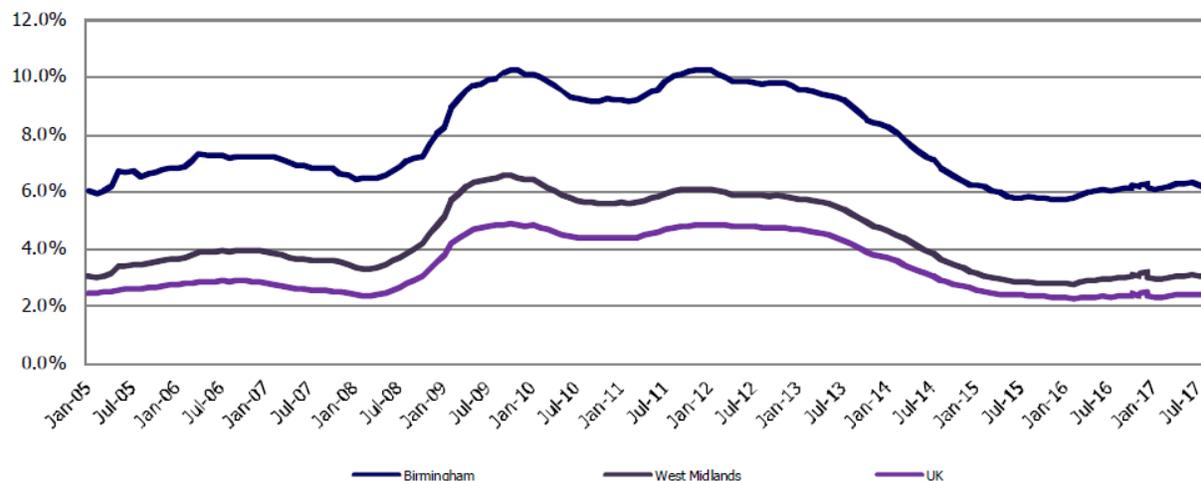
Nearly a third (30.6%) of Birmingham’s working age population is economically inactive (neither working nor seeking work). This is 9.0 percentage points higher than the national rate. The female economic inactivity rate in the city is 11.3 percentage points higher than the male rate. Table 4.9 summarises economic inactivity for those aged 16-64 in Birmingham. This shows that the highest proportion of economically inactive residents are full time students (39.6%), which is 12.6 percentage points higher than the national average of 27.0%. The non-white economic inactivity rate is 39%, significantly higher than the white rate of 24%. Both rates are above the GB averages of 30% and 20% respectively.

Table 4.9 Economic Inactivity in Birmingham 2017<sup>2</sup>

	Birmingham (level)	Birmingham (%)	West Midlands (%)	Great Britain (%)
Student	87,400	39.6	28.2	27.0
Looking after family/home	61,500	27.9	26.1	24.4
Temporary sick	4,300	2.0	2.3	2.1
Long-term sick	36,800	16.7	20.9	22.1
Discouraged	!	!	0.3	0.4
Retired	11,300	5.1	11.8	13.2
Other	18,500	8.4	10.5	10.8
<b>Total Economically Inactive</b>	<b>220,600</b>	<b>30.6</b>	<b>23.6</b>	<b>21.6</b>
Male Economic inactivity	82,700	23.1	16.6	18.0
Female Economic inactivity	137,900	37.9	26.6	29.1
White Economic inactivity	93,900	23.7	20.9	20.2
BME Economic inactivity	125,300	38.8	34.8	29.9

Birmingham has seen persistently higher levels of unemployment over the past decade, compared to the West Midlands and the UK, as can be seen from Figure 4.12.

Figure 4.12 Unemployment Rates in Birmingham, the West Midlands and the UK, 2005-2017



Source: Birmingham Labour Market Update (January 2018)

Employment growth in the city as a whole is set to be relatively subdued over the period 2010-2025 as the economy recovers from the recession and adjusts to a decline in public sector employment. Indeed, the forecast level of employment in the city in 2025 is only just returning to the levels seen prior to the recession.

The Greater Birmingham & Solihull LEP is a partnership of businesses, local authorities and universities which supports private sector growth and job creation. It was set up to strengthen local economies, encourage economic development and enterprise, and improve skills across the region. The City Deal between the Government and the Partnership was announced in July 2012 which consists of a package of measures that are to be implemented to drive economic growth designed to exploit the area's economic assets and address its challenges<sup>59</sup>. The first phase of the City Deal is to focus on the delivery of a range of economic benefits for the Greater Birmingham and Solihull area. These include:

- ▶ 10,000 additional direct jobs, building on the 40,000 created by the vanguard Enterprise Zone in Birmingham City Centre;
- ▶ Leveraging in over £15bn of private sector investment over 25 years from £1.5bn of public funding;
- ▶ A Single Settlement to cover all economic development funding;
- ▶ A world-class skills system which meets the needs of employers and fulfils the expectations of employees;
- ▶ 3,560 apprenticeships (AGE) grants to be delivered by March 2013;
- ▶ Improvements to employers' perceptions of 'work readiness' year-on-year;
- ▶ In excess of 2,800 additional new homes through the use of public assets;
- ▶ At least 100% capital return on current market value of public assets;
- ▶ An Institute of Translational Medicine to respond to national unmet need, unlock growth potential in the NHS and create a portal for SMEs and international pharmaceutical companies;
- ▶ £35M of largely private sector clinical trial investment and £50M of free drugs;
- ▶ 15,000 homes refurbished delivering savings in domestic energy usage of 26 ktonnes pa of CO<sub>2</sub> and at least 40 public buildings refurbished delivering savings in energy usage of 10 ktonnes pa of CO<sub>2</sub>; and
- ▶ Retrofitting to the properties of 1,500 people on pension or disability premium and 2,250 people in fuel poverty.

The City Deal comprises five elements: GBS Finance; Skills; Public Assets; Life Sciences and Green Deal, each of which includes specific commitments from the LEP and Government. Progress against these will be monitored to ensure they are delivered.

Median gross weekly pay for workers in Birmingham in 2015 was £488.20. This figure is a 1.9% increase on 2014 but it is below the UK figure of £527.70 which saw a 1.8% increase from 2014. However, people who work in the city earn more than the residents (£538.70 compared to £488.20). Workplace earnings in the city are similar to the figure for the UK. The difference between resident and workplace earnings reflects Birmingham's position as the regional capital and the large numbers of people who commute into the city to work. It also highlights that not all Birmingham residents are able to access the better paid jobs in the city.

### Education and Skills

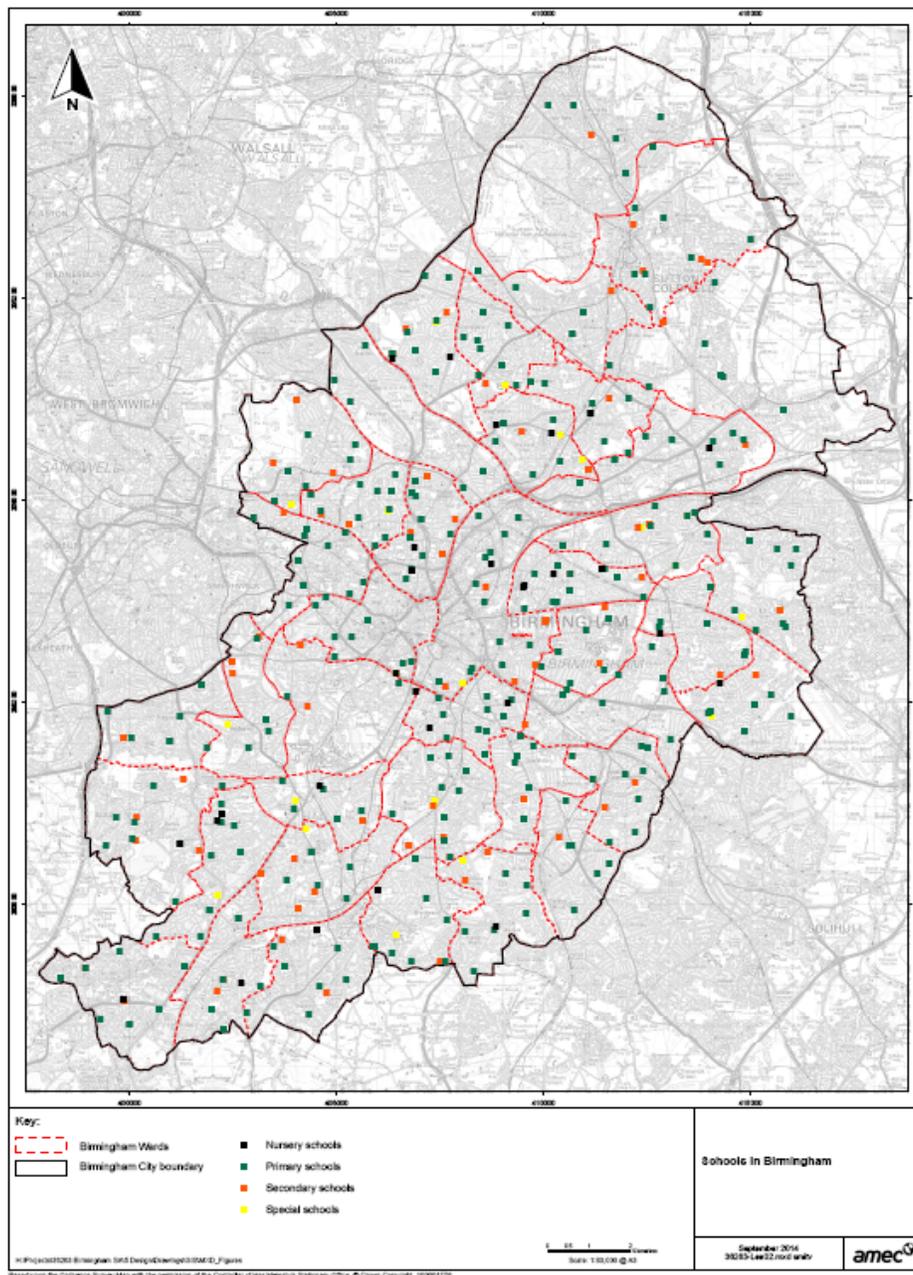
The City has a substantial education sector, from early years and schools through to colleges, universities and adult education. According to the Education Services Delivery and Improvement Plan (2017/18), the City has 445 state-funded schools. In addition, there are five colleges, five universities and a thriving independent school sector. The City Council itself is a major provider of adult and community learning through its Adult Education Service. (Figure 4.13). Birmingham is one of the youngest cities in Europe with around 46% of the population aged under 30. Based on 2014 levels, by 2022 the population aged between 0 to 4 is due to grow by 3.8% to 88,100 children; the 5 to 9 population is expected to grow by 4.5% to 84,000 but the largest growth rate in Birmingham's children will be the 10 to 14 age group – increasing by 14.6% to 82,600. The demographic makeup of Birmingham's young people has also changed significantly over recent years and is becoming increasingly diverse. For example, according to the 2011 census over 60% of the under 18 population is now from a non-white British background, compared to around 44% in

<sup>59</sup> <http://centrefenterprise.com/about-the-lep/key-projects-and-issue/>

2001. Approximately, 43% of Birmingham's school children have a first language that is other than English. This equated to 38,089 pupils, which is 1.3% more than in 2014.

According to the Annual Population Survey (2017), the City has a substantial education sector (Figure 4.13). The pupils and students of the City's schools and colleges have made major improvement in educational achievement, closing the gap on national averages. The percentage of Birmingham's population achieving NVQ Level 3 or above in 2011 was 43.5%, and this has increased to 50.4% in 2017. However, this remains marginally below the Regional average (50.8%) and significantly below the National average (57.2%). The proportion of the population educated to degree level was 31.4% compared to 31.8% regionally and 38.6% nationally. As a result, nearly half the high-skilled jobs in Birmingham are currently taken by people who live outside of the City.

Figure 4.13 Nursery, Primary and Secondary Education Resources across Birmingham



Birmingham’s 2016 GCSE results were very positive. 2016 saw the introduction of a new accountability system for schools with the new measure of Progress 8 – “the progress a pupil makes from the end of Key Stage 2 to Key Stage 4, compared with pupils nationally with similar attainment”. The national average performance is therefore zero. A positive score indicates out-performing the national average. Birmingham’s provisional result is zero, second best out of core cities.

Birmingham Adult Education Service (BAES) runs a number of adult education courses in the City and these can be undertaken in a variety of locations across the city and cover a wide variety of topics to help improve education and skills levels in the city. The Birmingham Education and Development Plan 2015-2020 includes a vision that by 2013 Birmingham will be:

*‘Renowned as an enterprising, innovative and green city that has delivered sustainable growth meeting the needs of its population and strengthening its global competitiveness.’*

To deliver the vision the plan includes a number of objectives including to ensure sufficient school places for young people; that additional places are provided where needed at the right time to meet needs; and to ensure young people participate fully in the school education offer and beyond into further education and training.

Worklessness and long term unemployment is a key issue for Birmingham’s residents and can lead to poor economic performance. Table 4.10 shows the total number of residents currently claiming Job Seekers Allowance (JSA). JSA is payable to people who are available for, and actively seeking work. The number of claimants steadily rose to over 50,000 in 2012 but had dropped to 30,685 by 2017. However, the claimant rate of 6.1% was higher than other cities in the UK – Newcastle was the next highest at 5.1%<sup>60</sup>.

Table 4.10 Total JSA Claimants 2007 - 2017<sup>61</sup>

	Birmingham (number)	Birmingham (%)	West Midlands (%)	UK
2007	35,058	7.7	3.9	2.7
2008	35,154	7.7	4.0	2.9
2009	49,011	10.7	6.6	4.8
2010	48,074	10.5	6.2	4.7
2011	49,319	10.8	6.2	4.8
2012	50,123	11.0	6.2	5.0
2013	47,278	10.4	5.8	4.6
2014	41,955	5.9	3.7	3.0
2015	31,605	4.4	2.5	2.1
2016	29,030	4.0	2.2	1.8
2017	30,660	4.2	2.3	1.8
2018	31,405	4.3	2.5	2.0

### Birmingham’s Local Centres

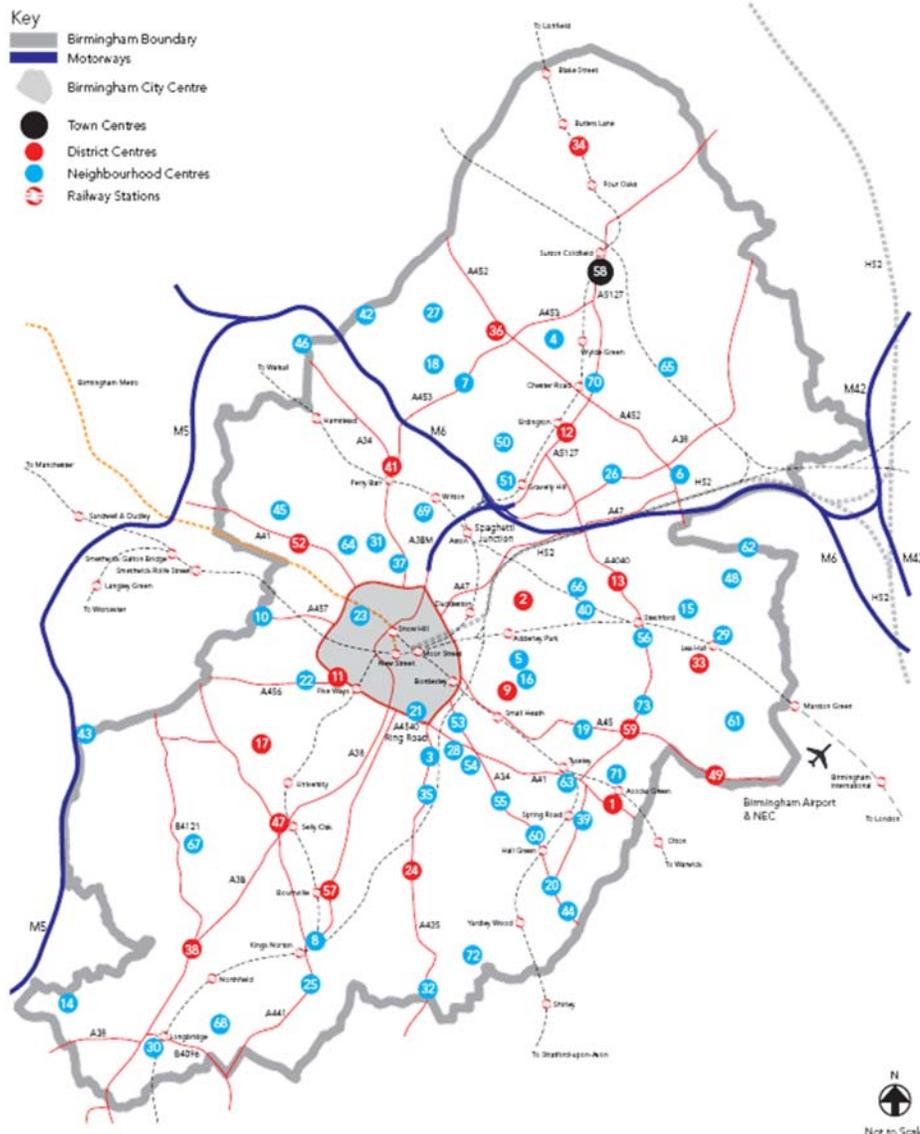
Birmingham’s network of 73 local centres provides the focal points for much day-to-day shopping and community activity. Uses of buildings within local centres have been surveyed by Birmingham City Council

<sup>60</sup> Figures from Birmingham Labour Market Update January 2018

<sup>61</sup> ONS claimant count with rates and proportions and Birmingham Labour Market profile 2018.

during 2013 and 2014 in order to help track of changes in use which can affect their vitality and require a policy response. Figure 4.14 below maps the local centres across the City.

Figure 4.14 Birmingham's Local Centres



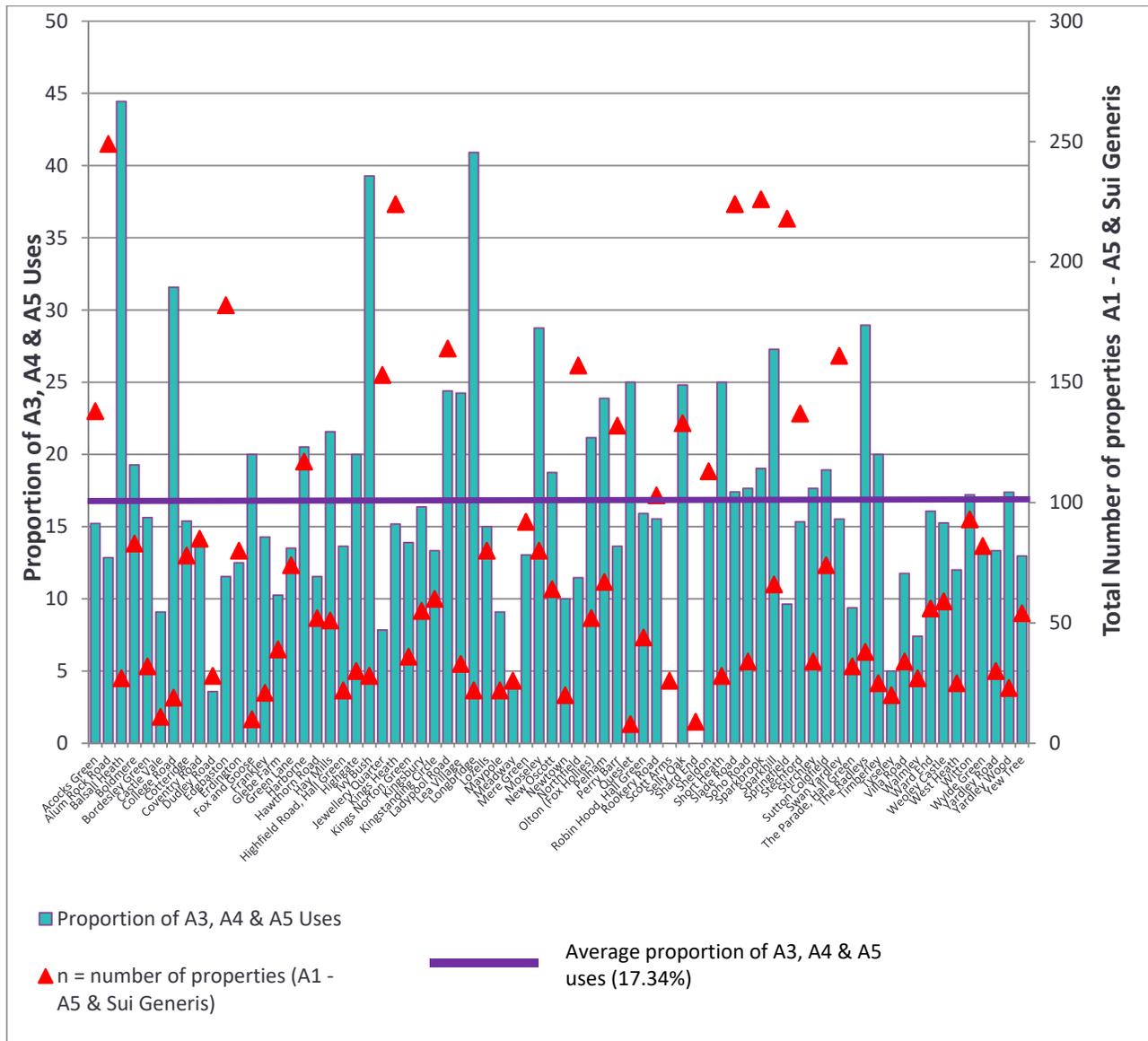
© Crown Copyright and database right 2011 Licence No. 100021326, 2012

Source: BCC (2012) Shopping and Local Centres SPD

- |                                |                                   |                            |
|--------------------------------|-----------------------------------|----------------------------|
| 1. Acocks Green                | 26. Kingsbury                     | 51. Slade Road             |
| 2. Alum Rock Road              | 27. Kingstanding Circle           | 52. Soho Road              |
| 3. Balsall Heath               | 28. Ladypool Road                 | 53. Sparkbrook             |
| 4. Boldmere                    | 29. Lea Village                   | 54. Sparkhill              |
| 5. Bordesley Green             | 30. Longbridge                    | 55. Springfield            |
| 6. Castle Vale                 | 31. Lozells                       | 56. Stechford              |
| 7. College Road                | 32. Maypole                       | 57. Stirchley              |
| 8. Cotteridge                  | 33. Meadway                       | 58. Sutton Coldfield       |
| 9. Coventry Road               | 34. Mere Green                    | 59. Swan                   |
| 10. Dudley Road                | 35. Moseley                       | 60. The Parade, Hall Green |
| 11. Edgbaston                  | 36. New Oscott                    | 61. The Radleys            |
| 12. Erdington                  | 37. Newtown                       | 62. Timberley              |
| 13. Fox and Goose              | 38. Northfield                    | 63. Tysley                 |
| 14. Frankley                   | 39. Olton Boulevard (Fox Hollies) | 64. Villa Road             |
| 15. Glebe Farm                 | 40. Pelham                        | 65. Walmley                |
| 16. Green Lane                 | 41. Perry Barr                    | 66. Ward End               |
| 17. Harborne                   | 42. Queslett                      | 67. Weoley Castle          |
| 18. Hawthorn Road              | 43. Quinton                       | 68. West Heath             |
| 19. Hay Mills                  | 44. Robin Hood, Hall Green        | 69. Witton                 |
| 20. Highfield Road, Hall Green | 45. Rookery Road                  | 70. Wylde Green            |
| 21. Highgate                   | 46. Scott Arms                    | 71. Yardley Road           |
| 22. Ivy Bush                   | 47. Selly Oak                     | 72. Yardley Wood           |
| 23. Jewellery Quarter          | 48. Shard End                     | 73. Yew Tree               |
| 24. Kings Heath                | 49. Sheldon                       |                            |
| 25. Kings Norton Green         | 50. Short Heath                   |                            |

Analysis of the proportion of three use classes – A3 (restaurants), A4 (pubs and drinking establishments) and A5 (hot food takeaways) – which are likely to be a particular focus for policy, reveals significant variation across centres, and some disproportionately high occurrences above the mean of 17.34% (Figure 4.15). The significance of some of these relatively high proportions of A3/A4/A5 uses in terms of their relationship to issues such as health is unproven. Section 4.6.8 below explores the spatial pattern of health across Birmingham.

Figure 4.15 Proportion of Use Classes A3, A4 and A5 by centre and total units



### Culture/Sport/Recreation

Birmingham is internationally known for sports and exhibitions, with well-known venues including the National Indoor Arena and the National Exhibition Centre. Developments in arts, sports and leisure have played a key part in the City’s renaissance over the past twenty years. Birmingham has many strengths including world-class performance, arts, sports and exhibition facilities, and internationally recognised companies of cultural excellence. Many of these facilities are located in the City Centre, including the International Convention Centre; Birmingham Symphony Hall, home of Birmingham Symphony Orchestra, the

National Indoor Arena, a major concert and sporting venue; Birmingham Hippodrome; Birmingham Royal Ballet and Birmingham Museum & Art Gallery. These are complemented by smaller venues such as the IKON Gallery, Jam House and Electric Cinema.

The proportion of leisure development that has taken place in centres has varied considerably year on year, and there appears to be no clear trend or pattern. This is probably in part due to the fact that there are various types of leisure development and some (e.g. sports facilities associated with playing fields or pitches), would not necessarily be expected to be located in centres. The relatively high proportion of out-of-centre leisure development overall since 1991 (61%) is skewed by a small number of very large developments, such as 'Star City' (Nechells), Birmingham Great Park and Longbridge which were committed before the current national planning policy guidance came into effect. There has also been a significant amount of leisure development based around existing sports facilities in out-of-centre locations. During 2010/11 88% was built out-of-centre including an indoor sports arena at the Tenby building, Great King Street (Aston). Also out-of-centre, but under construction, included the erection of a 5,000 seat stand at the Alexander Stadium in Perry Barr. Birmingham will host the 2020 Commonwealth Games which will prompt a significant amount of construction activity.

Investment in new hotels continues e.g. the Radisson and Etap. Other recent leisure developments in the City Centre include Millennium Point and the Five Ways Leisure complex. A significant amount of leisure development that has taken place in Birmingham since 1991 has been tourism related, for example, the National Sea Life Centre and Millennium Point. The number of overseas visitors to the City has increased from 520,000 in 2000, to 713,000 in 2012 and 1,110,000 in 2015<sup>62</sup>. Birmingham is now the fourth most popular destination in the UK among overseas residents after London, Edinburgh and Manchester. Birmingham welcomed the highest number of visitors on record in 2016, with tourist numbers reaching 39 million, and tourism revenue hitting an all-time high of £6.5 billion.

Culture and leisure facilities both attract people to Birmingham and serve local residents. According to the Community Strategy, surveys show that 45% of Birmingham residents had been to the theatre or a concert in the city in the last year, while 36% had visited a museum or gallery.

### Community Involvement

Community involvement can be measured by a number of indicators, including election turnout. Table 4.11 shows the election turnout in Birmingham for the 2017 General Election by constituency. It can be seen that the turnout varies between some of the different constituencies.

Table 4.11 General Election Turnout in Birmingham for the 2017 General Election

Constituency	% Turnout
Sutton Coldfield	70.06
Hall Green	69.63
Selly Oak	66.05
Edgbaston	64.21
Perry Barr	63.28
Northfield	61.53
Hodge Hill	61.50
Yardley	61.46
Ladywood	59.21
Erdington	57.37

<sup>62</sup> Source: <http://birminghamtoolkit.com/files/downloads/VisitorEconomyHeadlines2016withupdatedSTEAMfigures.pdf>

Constituency	% Turnout
--------------	-----------

Source:

[https://www.birmingham.gov.uk/info/20097/elections\\_and\\_voting/1273/parliamentary\\_general\\_election\\_results\\_june\\_2017/5](https://www.birmingham.gov.uk/info/20097/elections_and_voting/1273/parliamentary_general_election_results_june_2017/5)

Erdington constituency had the lowest turnout, which was the third lowest turnout in the UK. Conversely, Sutton Coldfield had the highest turnout, but this was only the 217<sup>th</sup> highest turnout in the UK.

One important aspect of community involvement is the extent to which people feel involved in the development of their local area. As part of the Government’s Big Society, new legislation has been introduced to encourage local people to have more say in how their area looks. Neighbourhood Planning is a process by which communities can come together and prepare land use plans that will guide the type of developments they would wish to see in their area.

The Sustainable Community Strategy indicates that in 2006, 40% of people agreed that they can influence decisions that affect their local area, an improvement of 22% from 2004. Furthermore, the Birmingham Community Strategy (Strategic Assessment Update November 2006) found over half those asked felt that people together can influence decisions in their constituency (most apparent in areas of Ladywood and Sparkbrook), compared to just over a quarter who felt that people collectively had little or no influence (most apparent in Perry Barr and Selly Oak).

### Equality

Birmingham’s residents are from a range of national, ethnic and religious backgrounds, as Birmingham is one of the most ethnically diverse cities in Europe. Table 4.12 summarises the proportion of the main ethnic groups present. Almost 10% are Pakistani, with the next largest groups being Indian and Black Caribbean. Between 1991 and 2001, the Black and Minority Ethnic (BME) population increased, particularly the Pakistani and Bangladeshi groups. BME groups are mainly concentrated in the inner parts of the City. BME groups vary in terms of housing, the labour market, health and age structure. Most established BME groups are growing through natural change and immigration. Since 2001 the city has attracted migrants from a widening range of countries, including Eastern Europe, Africa and the Middle East.

Table 4.12 Largest Ethnic Groups in Birmingham and England, 2010

Ethnic Group	% of Population Birmingham	% of Population England
White British	63.3	82.8
Pakistani	9.7	1.9
Indian	5.8	2.7
Black Caribbean	4.0	1.2
White Irish	2.1	1.1
White Other	2.6	3.6
Mixed Groups	3.2	1.8
Bangladeshi	2.5	0.7
All other groups	6.8	4.1

Source: Experimental Estimates, National Statistics, Crown Copyright 2010

Birmingham has a fairly youthful population. Approximately 46% of residents are younger than 30, compared with the national (England) average of 38%<sup>63</sup>.

<sup>63</sup> Source: Mid Year Population Estimates, ONS

Inequalities are reflected in statistics relating to people without a car. Birmingham has a relatively high percentage of households without a car, 38%, compared to the English average of 27%. The percentages without a car are high in the inner parts of the city and in some more peripheral areas. About two thirds of those in social-rented housing live in households without a car, as do nearly half of unemployed people and those not working because of long term sickness or disability. Percentages are particularly high among households containing lone pensioners and lone parents. Percentages are also high among Black, Bangladeshi and White Irish households.

Work undertaken for the West Midlands Local Transport Plan showed that there is generally good accessibility in most places at most times for the 33.7% (2001) of households without a car, due to the extensive bus network. However, two particular problems were identified with access for unemployed people to attend job interviews and with access to major NHS hospitals by public transport.

Further detail on equality has been covered in the section on Economy and Equality.

## Health

Information on health for Birmingham can be found in the NHS Health Profile for the area 2017<sup>64</sup>, which gives a snapshot of health in Birmingham. According to the NHS, life expectancy in Birmingham for males is 77.1 years which is 'significantly worse' when compared to an average across England of 79.5 years. Furthermore, life expectancy for females is 81.9 years compared to an average across England of 83.1 years.

Adults in Birmingham are less likely than average to follow healthy eating guidelines, but the proportion of obese adults is not vastly different to the England average. A survey undertaken by Sport England<sup>65</sup> reveals that there is a low rate of participation in sport and other physical activity in Birmingham compared with other local authorities within the West Midlands. The 2017 health profile reflects this trend with the percentage of physically active adults lower (51.1%) than the national average (57%).

Teenage pregnancy rates are 'significantly worse' for Birmingham (47.4 per 1,000) than the England average (38.1 per 1,000). Binge drinking is lower than the England average; however, hospital stays for alcohol-related harm were 'significantly worse' in Birmingham for 2017 with 6,786 per 100,000 rate of admission episodes for alcohol attributable conditions compared to the national average of 1,163<sup>66</sup>. Rates of sexually transmitted infections are better than the England average. The incidence of malignant melanoma is lower than average (2017). Estimated levels of adult 'healthy eating' and obesity are worse than the England average.

People in routine and manual occupations have poorer health than those in more highly-skilled jobs, and these people are also more likely to smoke. The infant death rate is greater than the England average in this group. Birmingham has a higher than average number of people working in lower grade jobs such as process plant and machine operatives than in the rest of the West Midlands and England.

Local health priorities for Birmingham include childhood obesity, statutory homelessness and reducing the numbers of vulnerable children and adults

## Poverty

According to the Index of Deprivation, in 2015 about 40% of Birmingham's residents lived in areas that were in the most deprived 10% in England. Concentrations are very high in wards to the east, north and west of the City Centre and also in the Tyburn and Kingstanding Wards to the north of the M6 motorway (Figure

<sup>64</sup> Available at <http://fingertipsreports.phe.org.uk/health-profiles/2017/e08000025.pdf> [Accessed April 2018]

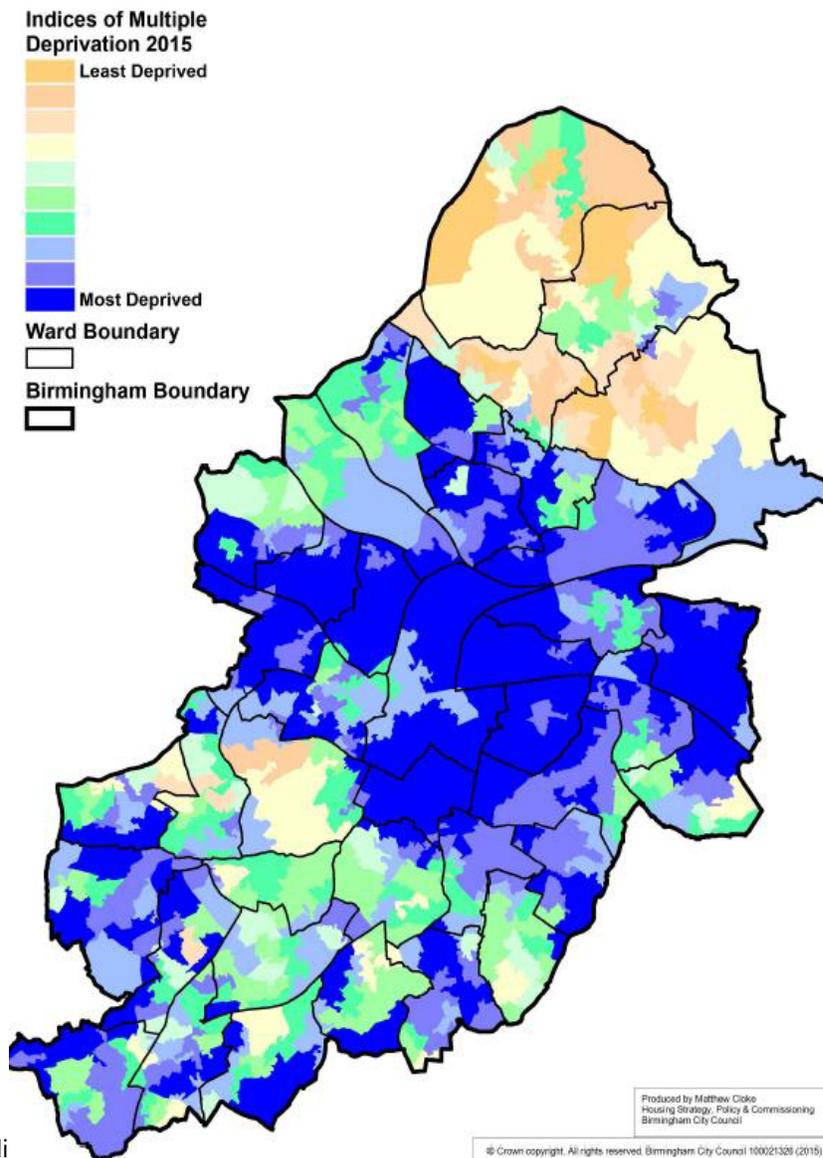
<sup>65</sup> [http://www.sportengland.org/research/active\\_people\\_survey/active\\_people\\_survey\\_2/regional\\_results.aspx](http://www.sportengland.org/research/active_people_survey/active_people_survey_2/regional_results.aspx)

<sup>66</sup> Public Health Organisations (2017) Hospital stays for alcohol related harm from 2017 Birmingham Health Profile

4.16). In 2014 (the most recent figures available) the proportion of child living in poor households in Birmingham was 32.9%, compared to 20.3% for England and 20% for the UK.<sup>67</sup>

In Birmingham there are over 100,000 children living in poverty, the equivalent of 37% of all children in the city (after housing costs). Nearly half of Birmingham's children live in the 10% most deprived areas in the country – with nearly 8,000 living in the 1% most deprived areas. Birmingham Ladywood Constituency has the third highest level of child poverty in the UK among parliamentary constituencies with 47% of children living in poverty after housing costs<sup>47</sup>.

Figure 4.16 Index of Multiple Deprivation 2015



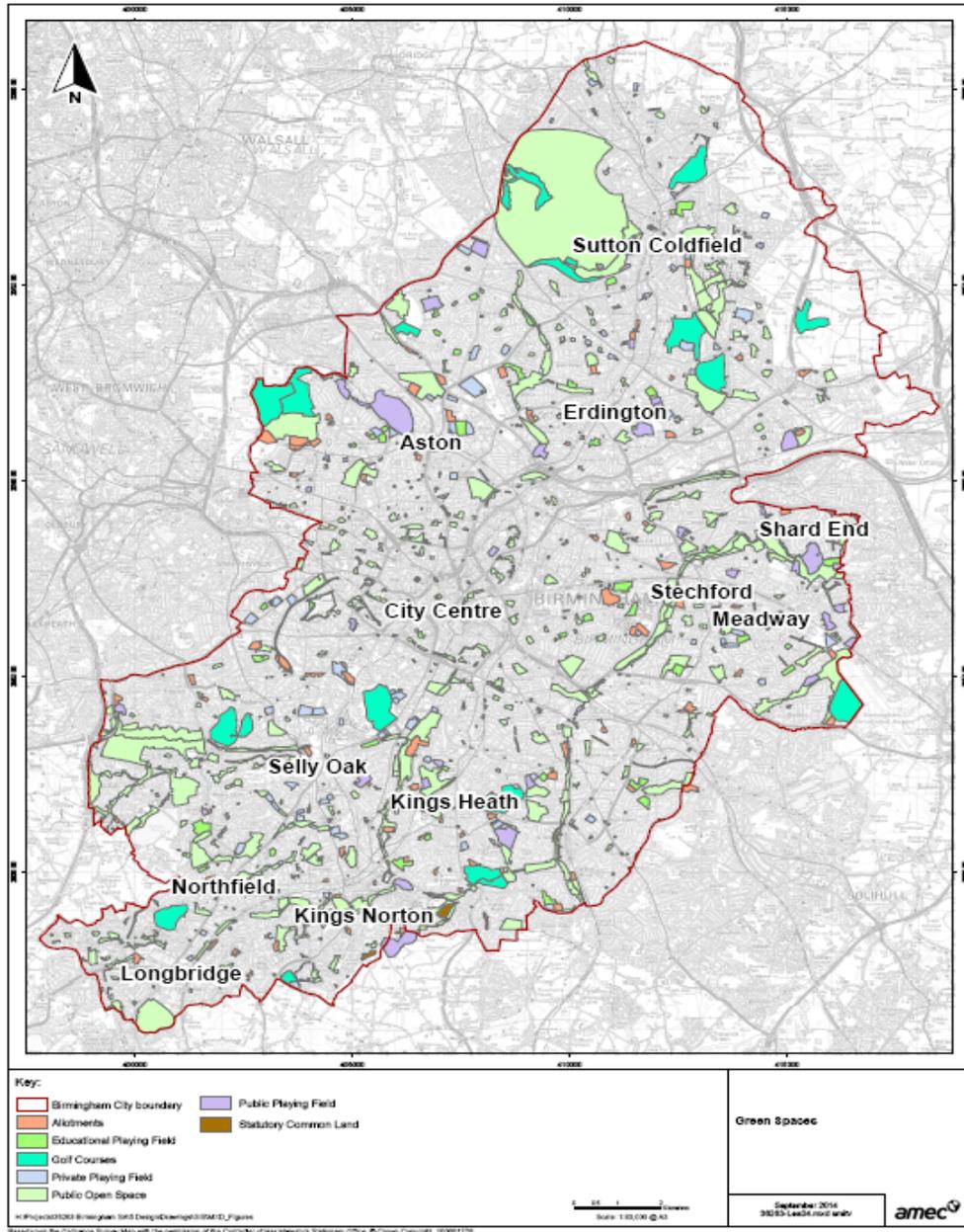
Data from the Public Health England's Index of Multiple Deprivation (IMD) 2015 shows that 32.9% of Birmingham's residents live in neighbourhoods classed as some of the most deprived (based on IMD classifications) compared to the average for England of 20%. In consequence, less than 10% of residents in Birmingham live in neighbourhoods classed as the least deprived.

<sup>67</sup> <https://www.gov.uk/government/statistics/personal-tax-credits-children-in-low-income-families-local-measure-2014-snapshot-as-at-31-august-2014-30-september-2016>

<sup>68</sup> Available from <http://fingertipsreports.phe.org.uk/health-profiles/2017/e08000025.pdf> [Accessed April 2017]

As noted above, well planned GI can give access to high quality green spaces that will provide opportunities for better health and well-being. Figure 4.17 illustrates the distribution of green spaces, by type, across the City. Further information on health in Birmingham can be found in the Department of Health Birmingham Health Profile 2017<sup>69</sup>.

Figure 4.17 Green Spaces Across Birmingham



## Crime

Burglary crime in Birmingham was declining between 2011 and 2015, however the most recent data from 2016 indicates that crime is on the rise. The total Birmingham crime rate for 2014-2016 is 205 crimes per 1000 people. This is notably much lower than other cities of a similar size: the crime rate in Manchester – the

<sup>69</sup>Department of Health Birmingham Health Profile 2017 <http://fingertipsreports.phe.org.uk/health-profiles/2017/e08000025.pdf>

next largest UK city after Birmingham – is 87% higher, at 384 crimes per 1000 people. Antisocial is the most reported crime in Birmingham, followed by violent crime, which is 40% higher than the national average. Crime and safety remain a concern of local people, however Birmingham City Council's Performance Plan<sup>70</sup> feedback indicates that 95% of Birmingham residents surveyed say they feel safe during the day. The Birmingham Community Safety Partnership's 2012 annual report reveals that the city is making good progress to reducing serious violence among 10-19 year olds, with a 19.3% reduction.

More recent figures show that Burglary crime whilst fluctuating has increased with 7,625 victims of Burglary reported for the 12 months ending 30<sup>th</sup> September 2017. Robbery has also increased with 3,647 incidents for the 12 months ending 30<sup>th</sup> September, compared with 3165 for the equivalent period in 2016. Shoplifting offences fell slightly, whilst violent offences have been steadily increasing, alongside possession of weapons offences. This is also reflected in the total crimes recorded in Birmingham which has been steadily increasing and stood at 96,992<sup>71</sup> for the 12 months ending 30<sup>th</sup> September 2017. In the month of February 2018, West Mercia police had recorded 10 street crimes in Birmingham and this included 3 violent offences, 1 incident of shoplifting and 2 other thefts.

Vehicle crime is a notably bigger problem in Birmingham than other cities. Although making up just 10% of total crime recorded in Birmingham in 2016 the city had the fourth highest amount of vehicle crime over the period in the country with 22 recorded incidents per 1,000 people which was 145%<sup>72</sup> higher than the national average.

Figures from the Birmingham Community Safety Partnership in 2005 showed that there are certain areas in Birmingham which have higher burglary rates than elsewhere in Birmingham, notably Erdington Ward, Lozells in Perry Barr, Bournbrook Student Area in Selly Oak, Frankley and Rubery in Northfield, and Brandwood and Billesley Ward Boundary in Hall Green. The number of robberies and muggings in Birmingham tends to fluctuate (as demonstrated by the more up to date statistics provided above), but there were higher rates in the following four areas than in other areas in Birmingham: Nechells Parkway in Ladywood District, Soho Road Lozells and Aston in Ladywood and Perry Barr Districts; the city centre; Coventry Road on the Ladywood, Bordesley Green and Yardley Border. Noise

Levels of noise pollution are problems in certain parts of the city according to the Sustainable Community Strategy<sup>73</sup>. Surveys have shown that one in eight residents are concerned about noise, and the Council receives over 3,000 complaints about noise a year. Traffic is one of the principal sources of this noise. Birmingham has pioneered 'noise mapping' to help manage the problem.

### **Influence of the DM DPD on Population and Human Health**

The influence of the DM DPD on population and human health could make a significant difference in respect of certain measures such as changes in the use of buildings in local centres. Here, for example, changes to hot food takeaways could be carefully monitored in order to gauge their potential impact on the character of the locality, health indicators and vulnerable groups such as children. Individual approaches to specific service centres may be required to take account of special circumstances including their size, economic health and proximity to specific receptors such as schools. More widely, the role of Green Infrastructure in promoting health and well-being needs to be recognised and planned for.

---

<sup>70</sup> Source: <http://www.birmingham.gov.uk/cs/Satellite?c=Page&childpagename=Policy-and-Delivery%2FPageLayout&cid=1223092613434&pagename=BCC%2FCommon%2FWrapper%2FWrapper>

<sup>71</sup> All crime statistics from <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/recordedcrimedatatacommunitysafetypartnershiplocalauthoritylevel> [Accessed April 2018]

<sup>72</sup> <https://www.verisure.co.uk/advice-and-help/crime-statistics/birmingham-crime-statistics>

<sup>73</sup> [https://www.birmingham.gov.uk/downloads/file/1543/strat1\\_sustainable\\_community\\_strategy\\_birmingham\\_2026\\_2008pdf](https://www.birmingham.gov.uk/downloads/file/1543/strat1_sustainable_community_strategy_birmingham_2026_2008pdf)

## Water & Air Quality

### The State of Birmingham's Rivers

The BCC SPD on sustainable management of rivers and floodplains<sup>74</sup> summarises the key issues relating to the state of the City's rivers:

- ▶ Parts of the river system are in a poor ecological state;
- ▶ Parts of the river system are inaccessible over much of their length and are of poor amenity value to the local community;
- ▶ Fly tipping of domestic and commercial waste;
- ▶ Beneath Birmingham, groundwater is rising, bringing with it contaminants that have previously remained in the ground;
- ▶ Wildlife habitats in the rivers and at the banksides have been badly damaged;
- ▶ During storms pollution flushes into the river, causing a loss of oxygen and killing fish; and
- ▶ There are increasing development pressures on bank-side locations.

Across the Humber River Basin<sup>75</sup> as a whole, despite recent progress, a range of challenges still remain, which will need to be addressed to secure the predicted outcomes. They include:

- ▶ Physical modifications - affecting 42% of water bodies;
- ▶ Pollution from waste water – affecting 38% of water bodies;
- ▶ Pollution from towns, cities and transport - affecting 16% of water bodies;
- ▶ Changes to the natural flow and level of water - affecting 6% of water bodies;
- ▶ Negative effects of invasive non-native species - affecting <1% of water bodies;
- ▶ Pollution from rural areas - affecting 32% of water bodies; and
- ▶ Pollution from abandoned mines - affecting 4% of water bodies.

### Reservoirs and Canals

Birmingham has 22 reservoirs as defined under the Reservoir Act 1975 of which 11 large raised reservoirs are the responsibility of Birmingham City Council. The remaining reservoirs are the responsibility of a variety of organisations including Environment Agency (3), Severn Trent Water (5), British Waterways (1) and private companies (2). Of these, two reservoirs are used for drinking water supply and one, a canal feed reservoir at Edgbaston.

Birmingham has an extensive network of canals, the exact length depends on where you draw the city boundaries, but the whole Birmingham Canal Navigations system extends for approximately 160 miles in total. It is one of the most intricate canal networks in the world. These waterways converge in the city centre at Gas Street Basin. The canals within Birmingham include:

- ▶ Birmingham & Fazeley Canal;

<sup>74</sup><https://www.birmingham.gov.uk/downloads/file/1166/sustainable-management-of-urban-rivers-and-floodplains-supplementary-planning-document>

<sup>75</sup> Environment Agency (2016) Humber River Basin Management Plan

- ▶ Birmingham Canal Main Line;
- ▶ Birmingham Canal Old Main Line;
- ▶ Grand Union Canal;
- ▶ Tame Valley Canal;
- ▶ Worcester and Birmingham Canal; and
- ▶ Stratford-upon-Avon Canal.

### **Air**

The whole of Birmingham was declared as an Air Quality Management Area (AQMA) in 2003. The main pollutant is nitrogen dioxide, the primary sources of which are transport and industrial combustion processes.

The transportation sector is a major contributor to the emissions of nitrogen oxides across the city, but there has been a slight decrease in the traffic contribution over the last few years according to the Air Quality Action Plan. The City's principal road network is illustrated in Figure 4.18 and shows the distinct presence of motorways to the north of the City and their influence, along with the City Centre, on NO<sub>2</sub> concentrations (Figure 4.19). The overall number of morning rush hour car trips into Birmingham City Centre has declined by around one third over the period 1999 – 2011 (AMR, 2013), replaced by an increase in rail trips by one third (18,987 to 27,674) and a doubling of tram trips (998 to 1,687).

Figure 4.18 Birmingham's Transportation Network

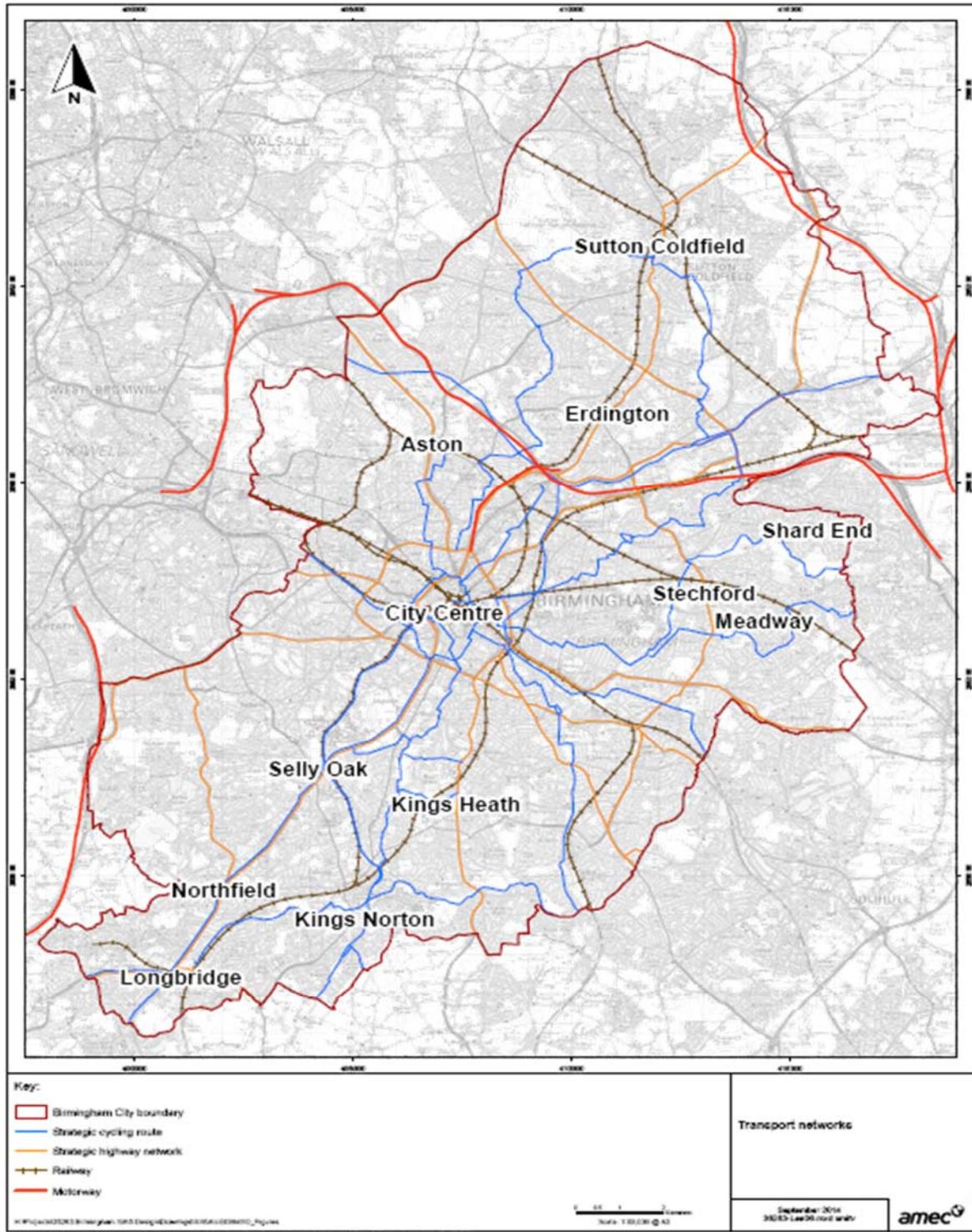
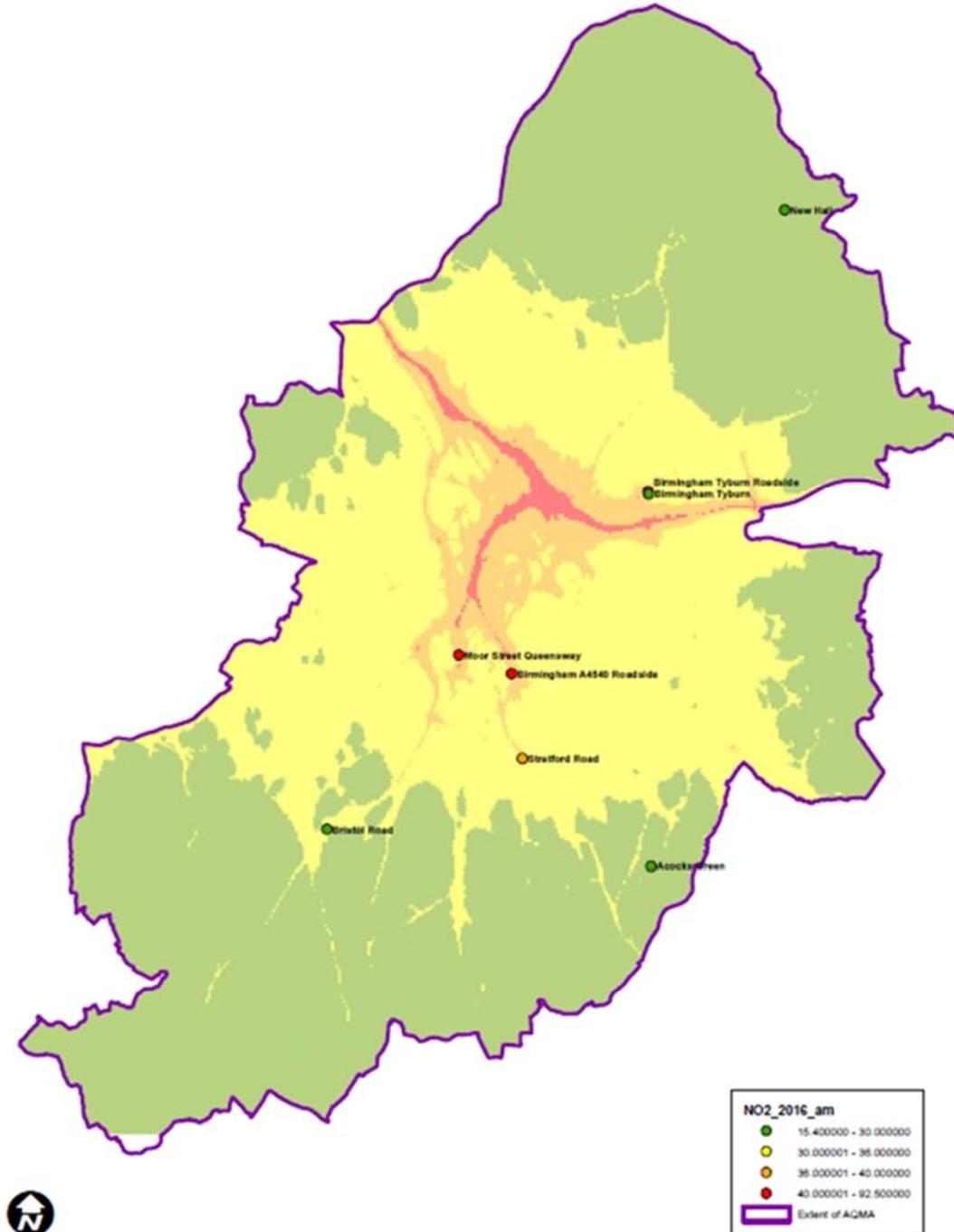


Figure 4.19 Modelled N<sub>2</sub>O Concentrations across Birmingham 2016<sup>76</sup>

### Influence of the DM DPD on Water and Air Quality

The influence of the DM DPD on water and air quality is likely to be both direct and indirect, short and longer term, and potentially cumulative reflecting the impact of multiple developments over a long timescale. Through the application of the supporting criteria to the policies and appropriate conditions, negative effects should be avoided and where appropriate mitigated. However, monitoring of developments will be required to determine net effects. A specific issue relates to the increased volume of waste water and sewage effluent

<sup>76</sup> Birmingham City Council (2017) 2016 Air Quality Annual Status Report (ASR)

associated with City’s growth proposals will need to be treated to a high enough standard to ensure that there is no detriment in the quality of the watercourses receiving this discharge. Given the dispersed nature of the proposed development, it is likely that there will be a requirement for widespread upgrading of the sewerage pipe network throughout the City. Policy will need to ensure that the sewerage system has adequate capacity to manage any additional flows.

## Cultural Heritage

### Built and Historic Environment

Birmingham has a wide variety of distinctive historic townscapes, buildings and landscapes. The extent of the City’s historic resource is summarised in Table 4.13 and mapped in Figure 4.20.

Table 4.13 Birmingham’s Historic Built Environment

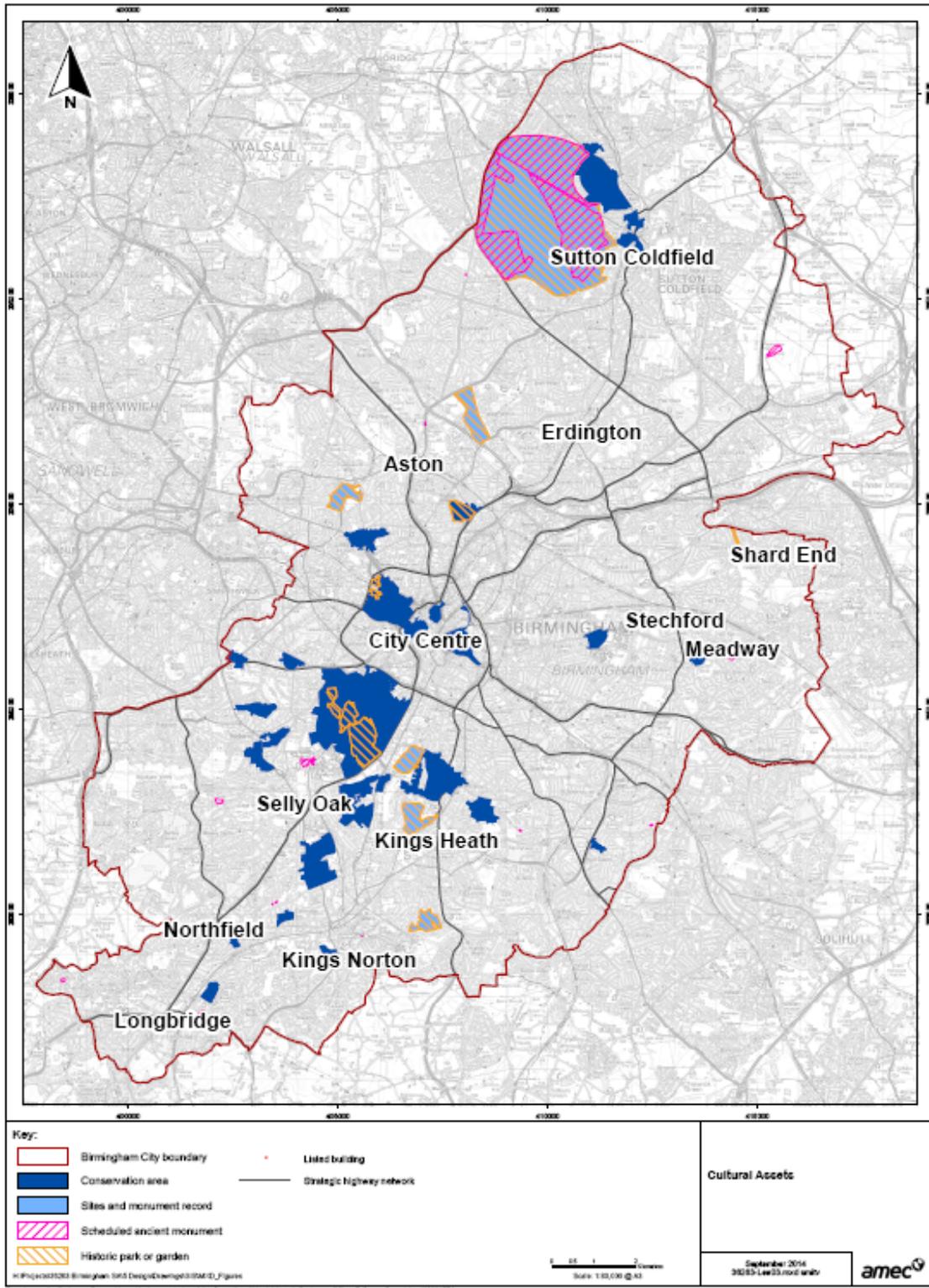
Heritage Asset	Number	Area (Hectares)
Scheduled Ancient Monuments	14	528.72
Statutorily Listed Buildings	1,486	369.98
Locally Listed Buildings	444	176.06
Conservation Areas	30	1,223.22
Registered Parks and Gardens	14	1,183.44
		Length (Kilometres)
Canals	-	57.4

Source: Birmingham City Council, AMR (2015)

There are currently 30 Conservation Areas in Birmingham, which account for 4% of the land area of the City including five within the City Centre. Some Conservation Areas, such as the Jewellery Quarter and Bourneville, are unique and are nationally recognised. Birmingham also has nearly 1,500 statutorily listed buildings and 14 registered parks and gardens of special historic interest. The City Council applied to the United National, Educational, Scientific and Cultural Organisation for ‘World Heritage Site’ status in 2011 for the Jewellery Quarter. The City’s Listed Buildings range in date from mediaeval churches and houses to important examples of twentieth century architecture. Birmingham also has an extensive network of historic canals, reflecting its key role during the Industrial Revolution in the eighteenth and nineteenth centuries.

The City’s archaeological resource is surprisingly varied for such a major urban area. Some remains are recognised as being of national importance, and are protected by scheduling. Known remains range in date from prehistoric earthworks to nineteenth and twentieth century industrial buildings and structures. The Historic Environment Record maintained by the City Council includes details of all known archaeological remains within the City. These now total almost 5,525 records which has increased from 5,445 from 2012. Historic Landscape Characterisation of the City commenced in 2011 with 4,141 polygons captured. Environmental improvements by the City Council during the late 1980s and early 1990s, such as the development of the ICC and Centenary Square, Victoria Square and the pedestrianisation of New Street, have improved the overall quality of the environment within the City Centre. There have been notable successes in relation to improving the quality of design and the environment, particularly in the city centre. This was recognised by the award to the city of the RTPI Silver Jubilee Cup in 2004. Birmingham also won the European City of the Future Award at the European Property Awards in Munich in 2005.

Figure 4.20 Birmingham's Heritage Assets



There are a number of challenges and opportunities facing Birmingham's historic environment including the condition of its designated and non-designated heritage assets, the continuing programme of townscape and public realm improvements, pressure on the skyline and its cultural identity and distinctiveness.

There are 26 entries on Historic England's 'at risk' register for Birmingham<sup>77</sup> and these include a number of churches, the Grand Hotel on Colmore Row, the public baths in Moseley, the Red Lion pub on Soho Road, several conservation areas, former school of art on Moseley road, and Perrott's Folly. The condition of these historic assets on the register varies, for example Icknield Street School is classed as category A i.e. at immediate risk of further rapid deterioration, as are the public baths on Moseley Road, the Red Lion pub on Soho pub is category C so in slow decay but not in any immediate risk of rapid deterioration and Austin Village Conservation Area is in very bad condition and is deteriorating significantly. Some of these are in the process of being repaired or have plans in place for repair whilst others are at risk, for example the vacant British Rail goods office.

Birmingham's Heritage Strategy<sup>78</sup> 2014-19 has four key aims:

- ▶ Preservation – including ensuring heritage is properly considered in the planning process, supporting the Heritage Champion and improving the sustainability of heritage programmes and projects;
- ▶ Prioritisation – including working with the Heritage Strategy Group to bring forward projects, including in local districts, to co-ordinate bidding for funds and planning for major anniversaries and city events;
- ▶ People – including participation, engagement volunteering, celebrating local heritage and identity and supporting Districts to engage with heritage in neighbourhoods; and
- ▶ Promotion – including building a better story around our heritage and improving our marketing of heritage assets.

The strategy notes that given reductions in funding available that partnership working will be important going forward for Birmingham's historic environment. The strategy also notes Community Infrastructure Levy (CIL) will be important for providing funding for the historic environment and also the Heritage Lottery Fund (HLF). HLF has identified a number of priority areas in the city which have received less funding than other parts of the region. These are:

- ▶ Perry Barr;
- ▶ Oscott;
- ▶ Handsworth Wood;
- ▶ Lozells & East Handsworth;
- ▶ Aston;
- ▶ Soho;
- ▶ Ladywood; and
- ▶ Nechells.

There is a continuing programme of townscape and public realm improvements in Birmingham which presents opportunities for historic environment improvements. One of the big City Centre development

---

<sup>77</sup> <https://historicengland.org.uk/advice/heritage-at-risk/search-register/results?q=birmingham&searchtype=har&page=2> [Accessed July 2018]

<sup>78</sup> Birmingham Heritage Strategy 2014-2019 Available at [https://www.birmingham.gov.uk/downloads/file/2008/exam\\_30\\_birmingham\\_heritage\\_strategy\\_2014-2019](https://www.birmingham.gov.uk/downloads/file/2008/exam_30_birmingham_heritage_strategy_2014-2019) [Accessed July 2018]

schemes currently ongoing is the paradise area between the museum and art gallery and the library. Paradise is to be transformed into a vibrant mixed use development of commercial, civic, retail, leisure and hotel space, providing major improvements to pedestrian access and greatly enhanced public realm befitting this exemplary historic setting. There are also masterplans for developments in other parts of the City Centre including around Snowhill.

In 2017 Historic England published an updated edition of Streets for all which is a practical guide for anyone involved in planning and implementing highways and public realm works in sensitive historic locations. A supplementary document was then published in the context of the West Midlands<sup>79</sup>. This document explains how historic character adds value to the region’s contemporary public realm and summarises some of the priorities and opportunities for further improvements to the West Midland’s streetscapes.

This supplementary document notes that through support by the Greater Birmingham and Solihull Local Economic Partnership, Birmingham is now in the top three spenders on public realm nationally. This level of spending has helped to deliver a number of public realm improvements across the City.

### Natural Landscape

Although much of Birmingham is built up, there is a significant amount of open land within the City (Table 4.14).

Table 4.14 The Natural Environment and Open Space

Open Space Category	Area (ha)	% of City Council Area
Sites of Special Scientific Interest	896.59	3.35
National Nature Reserves	811.73	3.03
Local Nature Reserves	316.73	1.16
Sites of Importance for Nature Conservation	828.03	3.09
Sites of Local Importance for Nature Conservation	698.98	2.62
Public Open Space	3,069.77	11.46
Public Playing Fields	296.9	1.11
Private Playing Fields	268.11	1.0
Private Open Space	67.19	0.25
Educational Playing Fields	166.33	0.62
Golf Courses	657.78	2.46
Statutory Common Land	11.25	0.04
Allotments	243.8	0.91
Green Belt	4,154.77	15.52

Source: Birmingham City Council, AMR (2015)

Landscape character is a key contributor to regional and local identity, influencing sense of place, shaping the settings of people’s lives and providing a critical stimulus to their engagement with the natural environment. The National Character Areas (NCAs) provide a description of landscape character across

<sup>79</sup> <https://content.historicengland.org.uk/images-books/publications/streets-for-all-west-midlands/heag149h-sfa-west-midlands.pdf/>

England<sup>80</sup>. These are used by Natural England to provide a context for monitoring landscape change through the Countryside Quality Counts (CQC) project<sup>81</sup>. Birmingham falls within two NCAs, Arden to the south and Cannock Chase and Cank Wood to the north. The part of the City which lies within Arden is almost entirely urbanised. The wider landscape to the south is characterised by a farmed woodland landscape of rolling landform with narrow meandering river valleys.

The National Character Area description relevant to Birmingham states:

*"Birmingham has a clearly-defined concentric pattern of development. Much of the landscape is dominated by 19<sup>th</sup> and 20<sup>th</sup> century housing, the former in characteristic red brick. Canals, parks, golf courses and the river corridor form the main open spaces, with a substantial parkland area around the University at Edgbaston and some low-density garden suburbs like Bourneville. Enclosed within the urban area are fragments of older landscapes like Castle Bromwich Park<sup>82</sup>."*

The change in landscape character in the period 1998-2003 is described in the CQC assessment as:

*"...development pressure continues to be evident throughout the area, with evidence of expansion around many major settlements such as Nuneaton, Coventry, Bromsgrove and Redditch, and expansion of major roads such as the M6 toll<sup>9</sup>."*

The northern part of the city lies within the Cannock Chase and Cank Wood NCA. Relevant extracts from the JCA are set out below:

*"Cannock Chase and Cank Wood is a landscape dominated by its history as a former forest and chase and by the presence at its centre of the South Staffordshire Coalfield. It forms an area of higher ground, with the towns and large villages of the Black Country rising out of the lowlands of Shropshire and Staffordshire to the west. In the south it merges with Birmingham and Arden. 9% of the area is woodland, 45% is urban and 9% lies within Cannock Chase AONB. Part of the area lies within the Forest of Mercia (Community Forest) and the Black Country Urban Forest. To the north of Birmingham and west of West Bromwich there are many more areas of open land, primarily in agricultural use, but with a large historic park at Sutton Park and with fragments of heathland, such as Barr Beacon. There are medium-sized fields, generally with good quality hedgerows, patches of ancient enclosure fields and areas of semi-natural vegetation including acid grassland, pools, fens and fragments of ancient woodland. Narrow, hedged lanes are often present and there is a real feeling of countryside despite the nearness of the built-up area<sup>83</sup>."*

The change in landscape character is characterised in the CQC assessment as:

*"High rate of change to urban (JCA ranked 11<sup>th</sup> nationally); 46% of JCA is within greenbelt. Marked expansion of fringe into peri-urban around Cannock, Lichfield, Burntwood and Norton Canes. Also development of M6 Toll has had major impact. Character of the area continues to be transformed."*

Approximately 15% of Birmingham's land area is designated as Green Belt which lies within the Cannock Chase and Cank Wood JCA. This includes all the open countryside within the City's boundary, as well as other areas extending into the City, for example along river valleys. There are also areas of open space within the built-up areas of the City, such as parks and playing fields, nature reserves and allotments.

### **Influence of the DM DPD on Cultural Heritage**

Development Management policies potentially have a significant influence over cultural heritage assets, emphasising the importance of clear policy, application of suitable conditions and monitoring of impacts to mitigate potential negative impacts.

<sup>80</sup> <http://publications.naturalengland.org.uk/category/587130>

<sup>81</sup> <http://www.countryside.gov.uk/LAR/Landscape/CC/cqc.asp>

<sup>82</sup> Source: [http://www.naturalengland.org.uk/Images/jca097-arden\\_tcm2-21191\\_tcm6-5424.pdf](http://www.naturalengland.org.uk/Images/jca097-arden_tcm2-21191_tcm6-5424.pdf)

<sup>83</sup> Source: <http://www.farmsteadstoolkit.co.uk/downloads/jca/JCA%2067.pdf>



# Appendix D

## Consultation Responses on the Scoping Report update (August 2018) and the Council's Response

Ref	Consultee	Consultee Response Summary	Response/ Action
1	Natural England	<p><b>General Comments</b></p> <p>We understand that due to the delayed adoption of the Birmingham Development Plan (adopted January 2017), work on this DPD has been put on hold and re-started this year. We also understand that Natural England provided comments on the 2014 SA Scoping Report in correspondence to you dated 22 January 2015.</p> <p>Specifically, we support and welcome the updating of this report in respect of the main changes (as acknowledged by your authority):</p> <ul style="list-style-type: none"> <li>- Updates to the evidence base (where required);</li> <li>- Updated DPD objectives (which are now the same as the BDP objectives); and</li> <li>- Updated review of policies and programmes.</li> </ul>	<p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken.</p>
	Natural England	<p><b>Scope of the Proposed Assessment</b></p> <p>We welcome the reference to the need for a Habitat Regulations Assessment and confirm that a HRA will be required to ascertain if any likely significant effects on any European site as a result of the Plan's implementation (either on its own or 'in combination' with other plans or projects) will occur and, if so, whether these effects will result in any adverse effects on the site's integrity.</p> <p>Where the possibility of significant effects cannot be excluded, a more detailed Appropriate Assessment (AA) is carried out to determine whether those effects would adversely affect the integrity of European sites.</p> <p>We welcome the comprehensive list of Plans, Programmes and Strategies relevant to the SA/SEA of the DM DPD at Table 3.1. Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area:</p> <ul style="list-style-type: none"> <li>• Green Infrastructure Strategies</li> <li>• Biodiversity Plans</li> <li>• Rights of Way Improvement Plans</li> <li>• Shoreline Management Plans</li> <li>• Coastal Access Plans</li> <li>• River Basin Management Plans</li> <li>• AONB and National Park Management Plans</li> <li>• Relevant Landscape Plans and Strategies.</li> </ul>	<p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken. The plans and programmes listed are considered to be comprehensive.</p>
	Natural England	<p><b>Main Issues Identified</b></p> <p>We welcome and generally agree with the key sustainability issues for Birmingham as detailed at Table 4.1.</p> <p><u>Proposed Objectives and Guide Questions</u></p> <p>NE notes that that only one guide question relates to biodiversity – i.e. <i>'Will development protect and where possible enhance the City's cultural and natural heritage?'</i> – In this regard, we recommend the strengthening of the need for restoration or enhancement of biodiversity in line with National Planning Policy Framework.</p> <p><u>Table 6.3 – Compatibility between the Sustainability Objectives and the Draft DM DPD Objectives</u></p> <p>NE advises that effective and inventive application of Policy ENV4 (<i>'To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage'</i>) can also lever in positive benefits towards 'education' and 'sustainable connectivity' Plan</p>	<p>Comments are noted. No action taken.</p> <p>This comment has been actioned accordingly.</p> <p>Positive benefits on these objectives have now been noted via positive scores in this table.</p>

Ref	Consultee	Consultee Response Summary	Response/ Action
		Objectives via adoption of a multi-functional green infrastructure approach.	
	Natural England	<p><b>Objectives Covering the Breadth of Issues Appropriate for Assessing the Effects</b> Generally, yes. We welcome in particular the positive correlations made between effective green infrastructure and human health.</p> <p>Ecological connectivity: There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We thus suggest adding 'Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced'.</p>	<p>Comments are noted. No action taken.</p> <p>Objective ENV4 amended to: <i>"To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage, including resilient ecological networks able to meet the demands of current and future pressures."</i></p>
2	Environment Agency	<p><b>Evidence Base</b> The updated scoping report incorporates our previous comments from 2015. The most up to date evidence base should be used going forward for this assessment.</p> <p>The Birmingham Level 1 &amp; Level 2 SFRA's were completed in 2012 and these should be updated to take into account the most accurate flood risk information and the updated climate change allowances (published in February 2016).</p>	<p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken – the Council will consider updates to the SFRA's as part of the evidence base work in support of this DPD.</p>
	Environment Agency	<p><b>Aims and Objectives</b> Section 1.3 'Aims and Objectives' does not include any reference to flood risk. The second to last bullet point states to 'enhance Birmingham's natural environment' but there should be a wording to ensure flood risk is not increased and reduced at every possibility.</p>	For continuity, the Aims and Objectives are drawn from the Birmingham Plan. These will be reviewed as part of future plan review.
	Environment Agency	<p><b>Flood Risk Baseline</b> In this section 'Managing and Reducing Flood Risk', the figures used relate to 2012/13 and 2013/14. We consider this section should refer to the most up to date data available which is most likely to be more representative.</p> <p>We assume the 'Historic Flood Risk' section on page 41 includes all flooding events to have occurred in Birmingham? We consider this should be updated with the most recent flooding events as it currently it goes up September 2008 and there have been a number of flooding events since then.</p>	<p>More recent data has now been included in this section.</p> <p>Reference to more recent flooding events has been added in this section.</p>
	Environment Agency	<p><b>Groundwater and Contaminated Land</b> From a Ground Water and Contaminated Land perspective there are no additional detailed comments to make on the updated Scoping Report. However we would re-iterate our comments made in 2014 regarding land contamination issues.</p> <p>Land contamination can be a significant source of water pollution in the environment. In the worst cases pollution plumes can extend many kilometres and can also cause pollution that impacts on boreholes used for Public Water Supply or impact the quality of ecology in linked surface waters.</p> <p>The plan should seek to protect water quality through the various regulatory and advisory mechanisms with respect to land contamination. The aim should strongly encourage voluntary remediation or remediation of land contamination through the planning regime.</p> <p>The plan should encourages the use of sustainable and effective remedial measures to prevent or address water pollution from sites affected by contamination and so provide a better environment and amenity value. This includes the sustainable recycling of water and soils where appropriate. However, these operations must not result in an</p>	<p>Comments are noted. No action taken.</p>

Ref	Consultee	Consultee Response Summary	Response/ Action
		<p>unacceptable release to groundwater and must where necessary have appropriate permits and controls.</p> <p>Sustainable remediation should seek to manage unacceptable risks to human health and the environment (including groundwater), while optimising the environmental, economic and social impacts. Sustainable remediation appraisal requires consideration of a wide range of environmental, social and economic factors, including, for example, climate change impacts such as greenhouse gas emission from the remedial works or the site itself, worker safety and cost.</p> <p>The concept that a site should be 'suitable for use' should underlie the approach to remediation of historic contamination. This means suitable for the environment as a whole, not just for use by people. Protecting surface water and groundwater may mean carrying out work over and above that required to make the land suitable for the proposed development and to protect human health.</p> <p>We would also strongly recommend that strategies promote risk based assessment methodology and good practice promoted through use of the framework, tools and supplementary guidance set out in Model procedures for the management of land contamination (Contaminated land report 11) (Environment Agency and Defra 2004).</p> <p>Management of Contaminated Land by application of the well-established principles and practices outlined above will help both the Local Authorities and the Environment Agency deliver its obligations to reduce diffuse urban pollution required by virtue of the Water Framework Directive.</p>	<p>Comments are noted. No action taken.</p>
3	Historic England	<p><b>Executive Summary</b></p> <p>In the Executive Summary can you please change reference from English Heritage to Historic England.</p>	<p>This change has been actioned accordingly.</p>
	Historic England	<p><b>Section 3 Plans and Programmes Review</b></p> <p>You may wish to add: The Government's Heritage Statement, 2017. <a href="https://www.gov.uk/government/publications/the-heritage-statement-2017">https://www.gov.uk/government/publications/the-heritage-statement-2017</a></p> <p>Protecting the past – informing the present. Birmingham's' Heritage Strategy 2014-2019 <a href="https://www.birmingham.gov.uk/downloads/file/2008/exam_30_birmingham_heritage_strategy_2014-2019">https://www.birmingham.gov.uk/downloads/file/2008/exam_30_birmingham_heritage_strategy_2014-2019</a></p>	<p>These have been added to the plans and programmes review accordingly.</p>
	Historic England	<p><b>Section 4 Key Sustainability Issues</b></p> <p>At present the Report sets out what the City's designated heritage assets area with a brief commentary but doesn't really set out the challenges and opportunities (the issues) facing Birmingham's historic environment such as the condition of its designated and non-designated heritage assets; the continuing programme of townscape and public realm improvements; the pressure on its skyline and its cultural identity and distinctiveness. Where do the risks lie? Birmingham's Heritage strategy (see above) may be a useful source.</p>	<p>The historic environment section of the baseline has been updated accordingly.</p>



# Appendix E

## Consultation Responses on the Scoping Report (2014) and the Council’s Response

### Consultee: English Heritage

“It appears an appropriately focussed proposal, proportionate and streamlined to the role of the Plan and as such I have no concerns. However, you may wish to apply the same or similar indicators as those that will monitor the HE policy in the B’ham Plan and in particular re the city’s heritage assets formerly ‘at risk’.

For information, EH has prepared specific guidance for the preparation of SA in relation to historic environment. It may be worth referring this to AMEC to consider and apply during work on the SA and the environmental report.”

### Consultee: Environment Agency

Comment	Response
<p><u>Executive Summary</u></p> <p>We support the inclusion of environmental issues identified as Key Sustainability Issues for the city of Birmingham (pages vi-ix).</p>	Noted
<p>We note the issue of water resources is raised in Theme 1; Resource Use, however recommend that another key theme relating to water sustainability is the timely provision of foul drainage infrastructure to support the proposed level of growth. The city’s transmission infrastructure is currently undersized to accommodate the increase in loading that will go hand in hand with the level of development proposed and the SA should ensure this is addressed through the DM DPD.</p>	Reference to foul drainage added to Theme 1
<p>We welcome the consideration of both climate change adaption and mitigation (Themes 2, 9 and 10). We question however whether Theme 10 should be relabeled as Flood Risk as this is the only issue identified in relation to the management of climate change. We question whether there are other climate change related issues that should be incorporated under this heading relating to health, wellbeing, biodiversity and infrastructure provision (see section 4.4.1: Climate Change page 23). The issue of flood risk could be separated out under its own heading as it is an issue in its own right as the issues are not wholly resulting from the impacts of climate change.</p>	<p>Flood risk separated out under Theme 10</p> <p>Links made to other climate change issues.</p>
<p>Theme 8: The efficient use of land should be linked with the issue of flood risk (theme 10) as the flood risk sequential test outlined within national policy steers development to areas at lowest risk of flooding. This can sometimes conflict with the preference for brownfield redevelopment sites. We support the reuse of brownfield land as this can enable the remediation of underlying ground contamination caused by previous land uses, improving ground water quality. This therefore links with Theme 16: water quality and vice versa.</p>	Link made
<p>Theme 16 refers to the chemical and biological quality of rivers and waterways, and observes that Birmingham suffers from low quality against these measures. Water quality in the city is largely influenced by the efficiency of the foul drainage infrastructure – this links to our comments in relation to Theme 1.</p>	Comment added
<p>We note that the 28 sustainability issues identified for this plan are to be addressed by 18 standard objectives which are taken from the Development Plan SA/SEA. It should be ensured that all issues raised within this report are reflected within the proposed objectives – it appears that Issue 1: Resources Uses (water) has not been included within the objectives. We recommend it is added in under ENV5 or ENV6.</p>	Added to ENV6

Comment	Response
<p>We draw your attention towards Sustainability Objectives 16, 17 and 18 on Page x, which appear to be duplicates of Objectives 1, 2 and 3.</p>	Corrected
<p><u>Plans, Programmes and Strategies</u></p> <p>Table 3.1 lists the <i>Severn Trent Water Resources Management Plan (2010)</i> under the Regional heading. This is updated every 5 years and as such this is not the current version. The SA should refer to the 2014 plan found at <a href="http://www.severntrent.com/future/plans-and-strategy/water-resources-management-plan">http://www.severntrent.com/future/plans-and-strategy/water-resources-management-plan</a> as referenced on page 15 of the report.</p>	Reference added
<p>The SA should also consider the findings of the Environment Agency publication <i>Tame, Anker and Mease abstraction licensing strategy (February 2013)</i> which can be found at <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291402/LIT_3306_bc78df.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291402/LIT_3306_bc78df.pdf</a>. This relates the availability of water for ground and surface water for abstraction purposes. Information from this strategy should be summarised alongside other water resources issues on page 15.</p>	Reference added
<p>The Environment Agency now has in draft the <i>Humber Flood Risk Management Plan</i> which sets out proposals for managing the risk of flooding at a catchment and river basin district scale. These proposals will help inform decisions about where investment and action are targeted in future to best protect people and places from the risk of flooding. For more information about this please see the link at the end of this letter that directs you towards this consultation document.</p> <p>Birmingham City Council also have a number of other water-based evidence documents that should be considered. These include:</p> <ul style="list-style-type: none"> <li>• <i>Surface Water Management Plan for Birmingham (2013 emerging draft)</i></li> <li>• <i>Local Flood Risk Management Strategy for Birmingham (2014 outline version). Preliminary Flood Risk Assessment (2011)</i></li> </ul>	References added
<p><u>Appendix A</u> reviews the relevant plans and programmes in more detail. Under the Objectives and Targets identified for the Water Framework Directive (WFD) (page A1) it states that all waterbodies are to reach 'Good Ecological Status' by 2015. This is currently correct, however this will change when the next round of River Basin Management Plan (RBMP) is published in December 2015, therefore this will need to be kept up to date. The next statement: '<i>Exactly what constitutes 'Good Ecological Status' has not yet been defined.</i>' is incorrect. The following definition is taken from the Humber RBMP (relevant to Birmingham) and should be reflected within the SA:</p> <p><i>Good ecological status applies to natural water bodies, and is defined as a slight variation from undisturbed natural conditions.</i></p> <p><i>Some water bodies are designated as 'artificial' or 'heavily modified'. This is because they may have been created or modified for a particular use such as water supply, flood protection, navigation or urban infrastructure. By definition, artificial and heavily modified water bodies are not able to achieve natural conditions. Instead the classification and objectives for these water bodies, and the biology they represent, are measured against 'ecological potential' rather than status. For an artificial or heavily modified water body to achieve good ecological potential, its chemistry must be good. In addition, any modifications to the structural or physical nature of the water body that harm biology must only be those essential for its valid use. All other such modifications must have been altered or managed to reduce or remove their adverse impact, so that there is the potential for biology to be as close as possible to that of a similar natural water body.</i></p>	Noted
<p>The objectives of the Trent Catchment Flood Management Plan (<i>CFMP</i>) are very broad and high level and should be summarised in terms relevant to the local distinctiveness of Birmingham as a city. The CFMP considers Birmingham alongside the Black Country, and forms Policy Unit 10. Based on the level of proposed growth, and flooding characteristics of the area, Policy Option 5 has been applied which identifies that Birmingham is to "<i>take further action to reduce flood risk</i>". This very specific aim should be reflected within the</p>	ENV5 amended



Comment	Response
SA's issues and objectives, particularly ENV5 i.e. the policies should ensure they do not just 'manage' flood risk but 'reduce' flood risk.	
The Humber RBMP (local delivery vehicle for WFD), although listed in Table 3.1 under the Regional subgroup does not appear to be included in Appendix A. This should be rectified with locally-specific objectives summarised and reflected within the SA. Consideration should also be given to the draft plan currently out for consultation.	Amended
We recommend that Birmingham City Council undertake a Water Cycle Study to pull together all the available information on water resource availability and water quality to inform detailed development management policies on development requirements and their impact on the water environment. This should be undertaken in liaison with Severn Trent Water and the Environment Agency with a focus on how development within the city will support objectives set out within the Humber River Basin Management Plan (already referenced within the report).	Noted
<p><u>Key Sustainability Issues for Birmingham</u></p> <p>Section 4.4.2 refers to information on planning application consultations and overrulings on flood risk issues from 2011/12. Information is currently available for 2013-14 which is likely to be more representative than the information currently included in this report. Environment Agency records show we responded to 64 consultations in 2013-14, which comprised as follows:</p> <ul style="list-style-type: none"> <li>• Full 35</li> <li>• Outline 8</li> <li>• Change of Use 5</li> <li>• Conditions 11</li> <li>• Reserved Matters 2</li> <li>• Variations 3</li> </ul> <p>Please find attached a dataset for this period detailing applications which we objected to on flood risk grounds. This information should be correlated with Birmingham's records of decisions made to ascertain if there were any overrulings during the period (we are not notified of all planning decisions). This may already be undertaken as part of the annual monitoring process.</p>	Equivalent 2013-14 data not yet available for Birmingham
Section 4.7.1 provides background information to the current state of water and air quality within the city. The Humber RBMP indicates that there are twenty-three surface water bodies which fall within or cross the Birmingham boundary comprising of two lakes, eight canals and thirteen rivers. In the baseline year of 2009 only three out of these twenty-three water bodies achieved the required 'Good Ecological Status' or 'Good Ecological Potential'. We draw your attention towards the WFD Evidence Pack provided by the Environment Agency to support the development of your Development Plan. The Humber RBMP is currently being revised with the new version being published in December 2015. The draft 2015 RBMP is now available as part of the formal consultation process, and any changes to the current plan should be considered within this report. The consultation on the 2015 plan is open until the end of March 2015 (please see details at end of letter).	Noted
The increased volume of waste water and sewage effluent produced by the proposed additional 50,000 dwellings will need to be treated to a high enough standard to ensure that there is no detriment in the quality of the watercourses receiving this discharge. Information currently available indicates that Minworth sewage treatment works should have the capacity to manage this additional capacity however given the dispersed nature of the proposed development, it is likely that there will be a requirement for widespread upgrading of the sewerage pipe network throughout the City. Section 4.7.4 should therefore include a reference to the required upgrading of foul drainage pipework and transmission infrastructure. Cumulative impact is key to this, making it hard to assess which sites and when will trigger the current drainage system to become overloaded and for water quality to become detrimentally impacted by development. It is likely therefore that a blanket policy is required to cover all developments and ensure the sewerage system has adequate capacity to manage any additional flows.	Text updated

Comment	Response
<p><u>Sustainability Objectives and the SA Framework</u></p> <p>Table 6.2 shows the proposed objectives, guide questions and indicators. As discussed above, in line with the emerging Birmingham Development Plan and the CFMP evidence base, ENV5 should be amended to reflect the need to REDUCE flood risk not just manage it. A guide question should be added to table 6.2 to ask 'Will development help reduce flood risk?'</p>	ENV5 amended
<p>We support the inclusion of ENV6 which aims to reduce pollution and ENV1 which will encourage the remediation of brownfield contaminated land. These objectives should help ensure the DM DPD is in line with Humber RBMP's requirements in improving the water quality of the city's rivers, canals and groundwater. The Environment Agency can provide information on water quality objections to planning applications which could be used as a potential indicator to ENV6 (as per flood risk in ENV5).</p>	Noted
<p><u>Development of Environment Agency publications as part of the evidence base</u></p> <p>Environment Agency strategies including the draft River Basin Management Plans (RBMPs) and draft Flood Risk Management Plans (FRMPs) are undergoing public consultation at present. The updated plans are due to be published in December 2015 and they will guide us in directing considerable investment and action from 2016 to 2021 and beyond, which will provide benefits to society and the environment. The catchment of interest to Birmingham city is the Humber.</p>	Noted

## Consultee: Natural England

Comment	Response
<p><b>Question 1 - Scope of the proposed SA</b></p> <p>Natural England is generally supportive of the scope of the proposed SA.</p> <p>We are also supportive of the series of objectives provided at 1.3 to confirm and clarify the Development Management DPD. We particularly welcome the recognised need for development to make a positive contribution to (1) ...health and well being, and (2) environmental considerations.</p>	Noted
<p>We support the proposed SEA Topic Areas as proposed at Table 4.1.</p>	Noted
<p>Paragraph 2.2.1 Habitat Regulation's Assessment (HRA) – we recognise the acknowledgement that a HRA will be required and concur with the need for this.</p>	Noted
<p><b>Question 2 - Do we agree with the main issues identified?</b></p> <p>We generally agree with the 28 sustainability themes (and related issues) identified as being particularly important affecting the city (page vi and Table 4.15). Specific comments in relation to the 28 Sustainability Themes (ST) and the related issues are provided below:</p>	Noted
<p>- We would argue that ST6 'Reducing the need to Travel' may be provided for via the provision of new / enhanced footways / cycleways and, by this, this ST may also potentially related to the improvement of health and well-being.</p>	Reference included
<p>- Natural England would also like to see a mention of the benefits of multi-functional green infrastructure (GI) (and blue infrastructure) as a potential consideration in the efficient use of land (ST8).</p>	Reference included
<p>- ST9 and ST10 (Reducing and Managing Climate Change) - relate to the important need for the city to tackle climate change. There are many ways that the natural landscape and GI can be utilised for this purpose.</p>	Reference included
<p>- ST13 (Natural Landscape) – Natural England understands that a large proportion of the open land and green belt land discussed here is being considered for development via the Birmingham Plan. The SA / DM DPD,</p>	BDP not yet approved

Comment	Response
therefore, surely needs to recognise this here in order to be able to provide a truly reflective account. In this way, should Figure 4.9, Table 4.5 and the statistics provided within paragraph 4.8.2 (Natural Landscape) also be updated to reflect the reduction in green belt and public open space area's proposed?	
- ST14 (Biodiversity and Geodiversity) – Incorrect reference to Biodiversity Enhancement Areas (BEAs). This work / project has now ceased. Reference here should instead be made to The Cannock Chase to Sutton Park Project. Reference should also be made here to the Nature Improvement Area (NIA) designation. (see notes re: NIA below).	BEA reference removed NIA reference included
- ST25 (Health) – we support the reference to natural landscape and recreation.	Noted
ST28 (Culture/Sport/Recreation) – we support the reference to health and natural landscape.	Noted
<p>Section 4: Key Sustainability Issues for Birmingham</p> <p><i>Managing and Adapting to Climate Change</i></p> <p>- Paragraph 4.4.2 – Natural England welcomes the reference made here in respect of the value of GI to helping to mitigate and adapt to climate change. We also recommend a reference to the value of blue infrastructure (e.g. rivers, canals, SuDS) for this purpose.</p>	Reference included
- Paragraph 4.4.4 (Influence of DM DPD on Managing Climate Change) – potential inclusion of need for maximisation of GI as part of development proposals, as appropriate, to help mitigate and adapt to climate change.	Reference included
<p><i>Biodiversity and Geodiversity</i></p> <p>- Section 4.5—acknowledge the importance of urban ecological sites and corridors as stepping stones for habitats/species and, in accordance with paragraph 109 of the NPPF, also acknowledge the need to establish improved coherent ecological networks that are more resilient to current and future pressures. We would also recommend inclusion of reference to multi-functional GI (and blue infrastructure) for this purpose.</p>	Reference included
- Acknowledge also the need for the council to ensure net gains are made (to conserve and enhance biodiversity) where possible, from development proposals by applying the ' <i>avoid, then mitigate and, (as a last resort) compensate for adverse impacts on biodiversity</i> ' principle (NPPF para 118). By this, when determining planning applications opportunities to incorporate biodiversity in and around developments should also be encouraged.	Reference included
- Also, given the need to minimise impacts on biodiversity and geodiversity, the SA must ensure the DM DPD policies promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets (NPPF 117).	Reference included
- Page 34 – we support the reference made to the work of the West Midlands Biodiversity Partnership (WMBP) and in particular, The Cannock Chase to Sutton Park Project. References made to the 'BEA', however, are incorrect as this designation / project has now ceased.	BEA reference removed
- Page 34 - This section should also acknowledge the Nature Improvement Area (NIA) designation. NIAs are fundamental to the step-change needed to establish a coherent and resilient ecological network. Where NIAs are in place (in accordance with para's 117 and 157 of the NPPF), Natural England wishes to see Local Plans: identify them on proposals maps; and include policies to ensure that any development affect them is compatible with their purpose and makes a positive contribute to their enhancement (using CIL/S106 agreements/conditions as appropriate).	Reference included
- Page 34 (GI) – neglects to include a reference to climate change mitigation and adaptation benefits.	Reference included
- Page 38 (Geodiversity) – we support the inclusion of geodiversity within the SA. However, we recommend the SA makes an explicit reference to geological conservation and the need to conserve, interpret and manage geological sites and features in the wider environment not just in relation to designated sites	Reference made
- Paragraph 4.5.2 (Biodiversity and Geodiversity) – comments supported.	Noted

Comment	Response
<p><i>Population and Human Health</i></p> <p>- Paragraph 4.6.11 – Recommend inclusion of reference to GI benefits upon human health and well-being.</p>	Reference included
<p>Section 5: Issues and Problems Relevant to the DM DPD</p> <p>- Table 5.1 – Generally support.</p>	Noted
<p>- We particularly welcome the reference to the need for continued monitoring of developments on periphery of designated sites to determine potential indirect and cumulative impacts. We would, also, recommend the inclusion of a reference to the need for monitoring of effects upon designated sites which may result from other environmental pathways outside those developments on the immediate periphery.</p>	Noted and reference included
<p>- We also welcome the reference to the importance of greenspace and reductions in motor transport that can have positive impacts upon populations and health.</p>	Noted
<p>- Climate Change – include reference to GI and its benefits.</p>	Reference included
<p><b>Question 3: Do the objectives cover the breadth of issues appropriate for assessing the effects?</b></p> <p>Generally, yes. Ensure incorporation of the above.</p>	Noted

# Appendix F

## Regulation 18 (Issues & Options) Consultation Responses

Development Management DPD: Schedule of Regulation 18 Stage Consultation Responses					
Question 1: Do you agree with the Purpose and Aims of the DPD?					
Response from:	Support?	Reasons	LPA Response	Action	Ref
Selly Park Property Owners' Association.	Yes	- No comments.	Noted.	None.	006/1
Highways England	Yes	- Highways England is supportive of overall purpose and aims of the DPD and the DPD's complimentary role to the adopted BDP.	Noted.	None.	010/1
Dr Mike Hodder on behalf of Council for British Archaeology, West Midlands	Yes	- No comments.	Noted.	None.	015/1
Primesight	Yes	- No comments.	Noted.	None.	021/1
Susan Fleming on behalf of Clear Channel UK Ltd	Yes	- Aim and purpose understood. - Planning development policy for Birmingham needs to be current and in keeping with the recent development and regeneration.	Noted.	None.	025/1
Alvechurch Parish Council	Yes		Noted.	None.	022/1
Question 2: Please give us your views on the Objectives on page 6 of the Consultation Document					
Response from:	Comments	LPA Response		Action	Ref
Selly Park Property Owners' Association.	- No comments	Noted.		None.	006/2

Highways England	- Highways England supports the Objectives of the DPD.	Noted. The DPD objectives now utilise the same objectives of the BDP and cover all the previous objectives identified in the 2015 Consultation Document.	None.	010/2
Dr Mike Hodder on behalf of Council for British Archaeology, West Midlands	- Ensure that development responds to local character and history, in accordance with NPPF para 58.	One of the strategic objectives of the Birmingham Development Plan (BDP) is "To protect and enhance the City's heritage and historic environments". BDP Policy PG3 Place making requires all new development to "reinforce or create a positive sense of place and local distinctiveness, with design that responds to site conditions and local area context, including heritage assets and appropriate use of innovation in design."	None.	015/2
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	- The PCCWM support the DPD objective 1.	Noted. The DPD objectives now utilise the same objectives of the BDP and cover all the previous objectives identified in the 2015 Consultation Document. The contents of Objective 1 is covered by the following two BDP Objectives "To encourage better health and well-being through the provision of new and existing recreation, sport and leisure facilities linked to good quality public open space" and "To develop Birmingham as a City of sustainable neighbourhoods that are safe, diverse and inclusive with locally distinctive character."	None.	016/1
Turley on behalf of Calthorpe Estates	- Generally supportive of the six key objectives identified - Especially the commitment to the strengthening the vitality and viability of retail centres - And the objective to ensure that new development is designed to integrate effectively with its setting and promote local distinctiveness. -	Noted. The DPD objectives now utilise the same objectives of the BDP and cover all the previous objectives identified in the 2015 Consultation Document.	None.	019/1
Susan Fleming on behalf of Clear Channel UK Ltd	- Agree with the objectives, - Point 4 is key. Birmingham must be able to compete internationally and continue to attract investment from abroad.	Noted. The DPD objectives now utilise the same objectives of the BDP and cover all the previous objectives identified in the 2015 Consultation Document.	None.	025/2
Alvechurch Parish Council	- Should have respect and consideration to adjoining Authorities and areas.	Noted. BCC engages with other local authorities through the Duty to Co-operate and will continue to consult other local authorities at key stages in the preparation of the document.	None.	022/2
Environment Agency	- The Environment Agency support the Objectives identified on page 6.	Noted. The DPD objectives now utilise the same objectives of the BDP and cover all the previous objectives identified in the 2015 Consultation Document.	None.	012/1
Turley on behalf of Aberdeen Asset Management	- Generally supportive of these objectives. - Pleased the importance of strengthening the vitality and viability of centres has been recognised. Should be reflected in final drafting.	Noted. The DPD objectives now utilise the same objectives of the BDP and cover all the previous objectives identified in the 2015 Consultation Document.	None.	013/1

**Question 3: Please give us your views on the Proposed Policy List on page 8 of the Consultation Document**

Response from:	Comments	LPA Response	Action	Ref
Selly Park Property Owners' Association.	- No comments.	Noted.	None.	006/3
Susan Fleming on behalf of Clear Channel UK Ltd	- The Authority has identified those areas where they believe review or greater control is required.	The Consultation Document contains an assessment of existing policy documents and a list of proposed policies.	None.	025/3

**Question 4: Please give us your views on proposed Policy DM01 – Hot Food Takeaways**

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	- This should have no effect unless adjacent to existing Alvechurch parish residential or business buildings.	Noted.	None.	022/3

**Question 5: Please give us your views on proposed Policy DM02 – Sheesha Lounges**

Response from:	Comments	LPA Response	Action	Ref
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	- Policy should be written to design out crime, and to introduce, where appropriate, to ensure the community feel safe during an extended business/leisure day (i.e CCTV). - Particularly relevant when drawing Policy DM02 and DM03.	This policy is no longer proposed in the Preferred Options Document. The impacts of Sheesha Lounges are mainly on amenity of nearby residents or occupiers, noise and vibration, highway safety and access, parking and servicing are covered by proposed policies DM 2, DM6, DM13, DM14 in the Preferred Options Document. The requirement for development to create safe environments that design out crime and promote natural surveillance and positive social interaction is already provided through BDP Policy PG3 Place making. Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	016/2
Alvechurch Parish Council	- This should have no effect unless adjacent to existing Alvechurch parish residential or business buildings.	Noted.	None.	022/4

**Question 6: Please give us your views on proposed Policy DM03 – Restaurants, Cafés and Pubs**

Response from:	Comments	LPA Response	Action	Ref
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	- Request that reference be made to the need to design out crime, as to ensure the community feel safe during an extended business/leisure day (i.e. CCTV).	This policy is no longer proposed in the Preferred Options Document. The impacts of Restaurants, Cafés and Pubs are mainly on amenity of nearby residents or occupiers, noise and vibration, highway safety and access, parking and servicing are covered by proposed policies DM 2, DM6,	Detailed design guidance on creating safe places and anti-terror	016/3

	- Particularly relevant when drawing Policy DM02 and DM03.	DM13, DM14 in the Preferred Options Document. The requirement for development to create safe environments that design out crime and promote natural surveillance and positive social interaction is already provided through BDP Policy PG3 Place making. Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	measures and safe buildings will be set out in the emerging Birmingham Design Guide.	
Turley on behalf of Calthorpe Estates	- Policies DM03 and DM11 should be sufficiently flexible as to ensure that high quality niche offerings are not unduly restricted by broad blanket policies.	Policies specifically for Restaurants/ Cafes/ Pubs and Hotels and Guest Houses are not proposed in the Preferred Options Document. The proposed draft policies are unlikely to restrict niche offerings in any way.	None.	019/2
Alvechurch Parish Council	- No effect unless adjacent to existing Alvechurch parish residential or business buildings.	Noted.	None.	022/5
<b>Question 7: Please give us your views on proposed Policy DM04 - Environmental Protection – Air Quality</b>				
Response from:	Comments	LPA Response	Action	Ref
Highways England	- Highways England is supportive of the principle of the introduction of an Air Quality policy. - Not clear whether at this stage how (or indeed if) this policy may apply to road improvement schemes. - Recommendation that the policy should not be worded in such a way that it may be restrictive to the development and delivery of necessary road improvement schemes.	Noted.	None.	010/3
Alvechurch Parish Council	- Agree	Noted.	None.	022/6
<b>Question 8: Please give us your views on proposed Policy DM05 - Environmental Protection – Noise and Vibration</b>				
Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	- Agree	Noted.	None.	022/7
<b>Question 9: Please give us your views on proposed Policy DM06 - Environmental Protection – Light</b>				
Response from:	Comments	LPA Response	Action	Ref
Highways England	- The establishment of this policy is welcomed - Recommendation that the policy accords with requirements outlined by the Institution of Lighting Engineers (ILE) with evidence submitted in the form	Noted. Reference to guidance set out by the Institute Lighting of Professionals is included in the Preferred Options Document.	Comments have been taken into account and incorporated into the supporting text of the	010/4

	of an external lighting report.		policy.	
Susan Fleming on behalf of Clear Channel UK Ltd	- Consideration has to be given to public safety in specific environments and the ability for individuals and businesses to adequately protect themselves against criminal activity.	Noted. The proposed policy recognises that well-designed lighting can make a positive contribution to the urban environment, providing safe environments for a range of activities.	Comments have been taken into account and incorporated into the supporting text of the policy.	025/4
Alvechurch Parish Council	- Particularly applicable for the rural adjoining parish of Alvechurch.	Noted.	None.	022/8

**Question 10: Please give us your views on proposed Policy DM07 - Environmental Protection – Land Contamination**

Response from:	Comments	LPA Response	Action	Ref
	<ul style="list-style-type: none"> <li>- DMO7 is welcomed as it could provide further support for the protection of groundwater resources within the city and build upon BDP Policy TP6.</li> <li>- Land contamination can be a significant source of water pollution in the environment. The following principles are used when assessing the effect on groundwater solutions; The Precautionary principle; Risk-based approach; Groundwater protection hierarchy</li> <li>- We recommend these principles are incorporated into a policy addition to Policy DM07 as to deliver the Water Framework Directive.</li> <li>- Where the potential consequences of a development or activity are serious or irreversible the precautionary principle will be applied to the management and protection of water</li> </ul>	Noted. It is recognised that contamination of land can have adverse impacts on human health, wildlife and contribute to the pollution of water bodies. BDP Policy TP6 Management of Flood Risk and Water Resources states that "Proposals should demonstrate compliance with the Humber River Basin Management Plan exploring opportunities to help meet the Water Framework Directive's targets. Development will not be permitted where a proposal would have a negative impact on surface water (rivers, lakes and canals) or groundwater quantity or quality either directly through pollution of groundwater or by the mobilisation of contaminants already in the ground." The supporting text of the policy refers to the Environment Agency's principles in managing risks to groundwater (the precautionary principle, risk based approach and groundwater protection hierarchy).	Comments have been taken into account and incorporated into the supporting text of the policy.	012/2
Alvechurch Parish Council	- Agree	Noted.	None.	022/9

**Question 11: Please give us your views on proposed Policy DM08 – Private Hire and Taxi Booking Offices**

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	- No effect on Alvechurch Parish unless adjacent to existing property.	Noted.	None.	022/10

**Question 12: Please give us your views on proposed Policy DM09 – Education Facilities - Use of Dwelling Houses**

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	- May have an adverse effect through increased traffic if adjacent to existing property.	Noted. Proposed policy on DM13 Highway Safety and Access and DM14 Parking and Servicing addresses these impacts of development. The Preferred Options Document also includes a policy on Day nurseries and early years provision (DM9) and a policy on Places of worship and faith related community uses (D10) which covers proposals for the use of dwelling houses for education facilities.	None. Comments have been taken into account and incorporated into proposed policy.	022/11
<b>Question 13: Please give us your views on proposed Policy DM10 – Education Facilities – Non Residential Properties</b>				
Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	- May have an adverse effect through increased traffic if adjacent to existing property	Noted. Proposed policy on DM13 Highway Safety and Access and DM14 Parking and Servicing addresses these impacts of development. The Preferred Options Document also includes a policy on Day nurseries and early years provision (DM9) and a policy on Places of worship and faith related community uses (D10) which covers proposals for the use of dwelling houses for education facilities.	None. Comments have been taken into account and incorporated into proposed policy.	022/12
<b>Question 14: Please give us your views on proposed Policy DM11 – Hotels and Guest Houses</b>				
Response from:	Comments	LPA Response	Action	Ref
Turley on behalf of Calthorpe Estates	- Ensure that policy is sufficiently flexible to ensure that high quality niche offerings are not unduly restricted by broad blanket policies.	Policies specifically for Restaurants/ Cafes/ Pubs and Hotels and Guest Houses are not proposed in the Preferred Options Document. The proposed draft policies are unlikely to restrict niche offerings in any way.	None.	019/3
Alvechurch Parish Council	- Applicable if adjoining property in the rural adjoining parish of Alvechurch.	Noted.	None.	022/13
<b>Question 15: Please give us your views on proposed Policy DM12 – Houses in Multiple Occupation - City-wide</b>				
Response from:	Comments	LPA Response	Action	Ref
Selly Park Property Owners' Association.	- Policy should restrict the development of HMOs where they will impact on the standards of residential amenity and character the area - The cumulative effect of HMOs in an area to also be considered.	Noted. Proposed policy DM10 HMOs and other non-family housing and DM2 Amenity address the individual and cumulative impacts of HMOs on residential amenity.	None. Comments have been taken into account and incorporated into proposed policy.	006/4
Summerfield Residents Association	- SRA collectively registers support for the introduction of an Article 4 Direction in parts of Ladywood Ward.	Comments are noted. However, this consultation relates to the Development Management DPD. The process for considering further Article 4 Direction area is separate to the DPD process. Justification for an	The request for an Article 4 Direction for parts of	011/1

	<ul style="list-style-type: none"> <li>- It would provide control over increasing concentration of Houses in Multiple Occupation (HMOs) in this historic residential area, which is blighted with an over proliferation of such properties (including hostels).</li> <li>- A desire to attract more families to the area as achieved by SRB6 and Housing Market Renewal Initiatives.</li> <li>- Concerned with related ancillary issues associated with HMO's such as parking/anti-social behaviour</li> <li>- Concern on the proliferation of 'To Let' signs and associated negative connotations</li> </ul>	<p>Article 4 Direction is based on whether the exercise of permitted development rights would undermine local objectives to create or maintain mixed communities. Government guidance states that the use of Article 4 Directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. The potential harm that the direction is intended to address should be clearly identified. It is considered that a strategic approach is needed for addressing issues with HMOs. In assessing the need for further Article 4 Directions, a city-wide analysis will be undertaken to assess the locations and concentration of HMOs. A mapping exercise of the licensed HMOs, along with Council Tax N exemptions and planning consents for Sui Generis HMOS is underway.</p> <p>The introduction of the new licensing rules will require many more properties to be licenced resulting in enable a better understanding of the location and numbers of HMOs in the City. Based on analysis of this intelligence, a more robust and strategic approach to the need for consideration for further Article 4 Direction Areas can be taken to ensure that there is a sound basis for an Article Direction to be pursued. This work is underway and will be reported to the Corporate Director for Economy in February 2019.</p> <p>The concern regarding the over-concentration of HMOs is acknowledged. The proposed policy DM10 HMOs and other non-family housing and DM2 Amenity seek to address the individual and cumulative impacts of HMOs on residential amenity. See draft policies in the Preferred Options Document.</p>	<p>Ladywood Ward is noted. A city-wide analysis will be undertaken to consider the need for further Article 4 Direction Areas. This work is underway and will be reported to the Corporate Director for Economy in February 2019.</p>	
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	<ul style="list-style-type: none"> <li>- Article 4 Areas should address the need for appropriate crime prevention measures in terms of location, design, layout and other infrastructure to reduce crime and the fear of crime.</li> </ul>	<p>Comments are noted. However, this consultation relates to the Development Management DPD. The process for considering further Article 4 Direction area is separate to the DPD process. The requirement for development to create safe environments that design out crime and promote natural surveillance and positive social interaction is already provided through BDP Policy PG3 Place making. Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.</p>	None.	016/4
Alvechurch Parish Council	<ul style="list-style-type: none"> <li>- Particularly applicable if adjoining property in the rural adjoining parish of Alvechurch.</li> </ul>	Noted.	None.	022/14
Ladywood District Committee	<ul style="list-style-type: none"> <li>- There is very strong support for this approach.</li> <li>- Not every, but many, landlords do not maintain their properties or surroundings; or manage the behaviour of their tenants, leading to deterioration of neighbourhoods and tensions within local communities.</li> <li>- These properties are often occupied by vulnerable individuals; our concern is about landlords who</li> </ul>	<p>Noted. The concern regarding the over-concentration of HMOs is acknowledged. The proposed policy DM10 HMOs and other non-family housing and DM2 Amenity seek to address the individual and cumulative impacts of HMOs on residential amenity. See draft policies in the Preferred Options Document. It is also important that adequate living conditions are provided for occupants of HMOs. The licensing of HMOs is a separate regulatory regime to planning and seeks to secure minimum standards of accommodation fit for human habitation such as fire safety standards and</p>	None.	024/1

	seem to feel no responsibility to support these individuals.	access to basic facilities such as a kitchen, bathroom and toilet.		

**Question 16: Please give us your views on proposed Policy DM13 – Houses in Multiple Occupation – Article 4 Areas**

Response from:	Comments	LPA Response	Action	Ref
Selly Park Property Owners' Association.	<ul style="list-style-type: none"> <li>- Concern about exclusion of Bournbrook from the Article 4 area.</li> <li>- Supplementary planning guidance should ensure the standards of residential amenity and character of an area are maintained and cumulative impact is taken into account.</li> </ul>	Bournbrook was excluded from the Article 4 Direction area as it would be ineffective due to the already high concentration of HMOs. The proposed policy DM10 HMOs and other non-family housing and DM2 Amenity seek to address the individual and cumulative impacts of HMOs on residential amenity. See draft policies in the Preferred Options Document.	None.	006/5
Summerfield Residents Association	<ul style="list-style-type: none"> <li>- SRA collectively register support for the introduction of an Article 4 Direction in parts of Ladywood Ward.</li> <li>- It would provide control over increasing concentration of Houses in Multiple Occupation (HMOs) in this historic residential area, which is blighted with an over proliferation of such properties (including hostels).</li> <li>- A desire to attract more families to the area as achieved by SRB6 and Housing Market Renewal Initiatives.</li> <li>- Concerned with related ancillary issues associated with HMO's such as parking/anti-social behaviour</li> <li>- Proliferation of 'To Let' signs</li> </ul>	See above response to 011/1	See above action to 011/1	011/2
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	<ul style="list-style-type: none"> <li>- Policies DM12 Houses in Multiple Occupation and DM13 Houses in Multiple Occupation – Article 4 Areas, address the need for appropriate crime prevention measures</li> <li>- Appropriate measures suggested included location, design, layout and other infrastructure to reduce crime and the fear of crime.</li> </ul>	The requirement for development to create safe environments that design out crime and promote natural surveillance and positive social interaction is already provided through BDP Policy PG3 Place making. Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	016/5
Alvechurch Parish Council	<ul style="list-style-type: none"> <li>- Particularly applicable if adjoining property in the rural adjoining parish of Alvechurch.</li> </ul>	Noted.	None.	022/15

**Question 17: Please give us your views on proposed Policy DM14 – Flat Conversions**

Response from:	Comments	LPA Response	Action	Ref
----------------	----------	--------------	--------	-----

Selly Park Property Owners' Association.	<ul style="list-style-type: none"> <li>- Proposals to convert houses into flats should take into account the standards of residential amenity</li> <li>- Not have an adverse impact on the character of an area.</li> <li>- The cumulative effect should also be considered.</li> <li>- The requirement to accommodate parking on site should be given priority.</li> </ul>	The proposed policy DM10 HMOs and other non-family housing and DM2 Amenity seek to address the individual and cumulative impacts of HMOs on residential amenity. Impact of development on highway safety and access, parking and servicing are covered by proposed policies DM13 Highway Safety and Access and DM14 Parking and Servicing. See draft policies in the Preferred Options Document.	None. Comments have been taken into account and incorporated into proposed policy.	006/6
Alvechurch Parish Council	<ul style="list-style-type: none"> <li>- Particularly applicable if adjoining property in the rural adjoining parish of Alvechurch.</li> </ul>	Noted.	None.	022/16

**Question 18: Please give us your views on proposed Policy DM15 – Hostels and Residential Homes**

Response from:	Comments	LPA Response	Action	Ref
Summerfield Residents Association	<ul style="list-style-type: none"> <li>- SRA collectively register support for the introduction of an Article 4 Direction in parts of Ladywood Ward.</li> <li>- It would provide control over increasing concentration of Houses in Multiple Occupation (HMOs) in this historic residential area, which is blighted with an over proliferation of such properties (including hostels).</li> <li>- A desire to attract more families to the area as achieved by SRB6 and Housing Market Renewal Initiatives.</li> <li>- Concerned with related ancillary issues associated with HMO's such as parking/anti-social behaviour</li> <li>- Proliferation of 'To Let' signs</li> </ul>	See response to 011/1	See response 011/1	011/3
Alvechurch Parish Council	<ul style="list-style-type: none"> <li>- Particularly applicable if adjoining property in the rural adjoining parish of Alvechurch.</li> </ul>	Noted.	None.	022/17

**Question 19: Please give us your views on proposed Policy DM16 – 45 Degree Code**

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	Agree	Noted.	None.	022/18

**Question 20: Please give us your views on proposed Policy DM17 – Planning Obligations**

Response from:	Comments	LPA Response	Action	Ref
----------------	----------	--------------	--------	-----

Highways England	<ul style="list-style-type: none"> <li>- Highways England supports the updated policy including continued use of Planning Obligations for developments not otherwise considered through the Community Infrastructure Levy (CIL).</li> <li>- In accordance to the response for the BDP, there is requirement for an improvement scheme at M42 Junction 9 following the Langley and Peddimore developments</li> <li>- The above needs, as identified and recorded in the city's Infrastructure Development Plan (IDP), were excluded from the Draft Regulation 123 list which enables these to be delivered via the CIL. Improvements, therefore, associated with these developments would need to be provided through Planning Obligations.</li> <li>- The updated policy should therefore be supportive of the provision of this infrastructure. Needs to be flexible, however, as to address any future infrastructure needs that may threaten the functionality of the SRN.</li> </ul>	With regard to the Sustainable Urban Extension (SUE) at Langley and Peddimore, all on site infrastructure requirements will not be funded by CIL and S106 contributions will instead be sought. This is stated within the current Regulation 123 list. This will include improvements to Junction 9 of the M42.	None.	010/5
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	<ul style="list-style-type: none"> <li>- Welcomes the inclusion of Policy DM17 Planning Obligations</li> <li>- Request that reference be made, either within the policy or within the supporting justification, to the potential requirement for contributions to be made towards Police infrastructure.</li> </ul>	A policy on Planning Obligations is no longer proposed in the Preferred Options Document as it is covered by the BDP Policy on Developer Contributions.	None.	016/6
Alvechurch Parish Council	<ul style="list-style-type: none"> <li>- Agree</li> </ul>	Noted.	None.	022/19

**Question 21: Please give us your views on proposed Policy DM18 – Telecommunications**

Response from:	Comments	LPA Response	Action	Ref
Mono Consultants on behalf of Mobile Operators Association	<ul style="list-style-type: none"> <li>- We consider it important that there is a specific telecommunications policy within the emerging DM DPD is line with national guidance provided in Section 5 of the NPPF.</li> <li>- When considering applications for telecommunications development, the planning authority should consider operational requirements of telecommunications networks and the technical limitations of the technology.-</li> <li>- "Proposals for telecommunications development will be permitted provided that the following criteria are met</li> </ul>	Noted. Comments have been taken into account and incorporated into proposed policy.	Comments have been taken into account and incorporated into proposed policy.	014/1

	<ul style="list-style-type: none"> <li>(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</li> <li>(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</li> <li>(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.</li> <li>(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</li> </ul>			
Alvechurch Parish Council	- Masts or other equipment seen from Alvechurch parish or other bordering authority's properties should not be considered.	The provision of advanced high quality communications infrastructure to serve local business and communities plays a crucial role in the national and local economy. The proposed policy for Telecommunications seeks to ensure the right balance is struck between providing essential telecommunications infrastructure and protecting the environment and local amenity.	None.	022/20

**Question 22: Please give us your views on proposed Policy DM19 – Aerodrome Safety**

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	Not applicable to Alvechurch	Noted.	None.	022/21

**Question 23: Please give us your views on proposed Policy DM20 – Tree Protection**

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	Agree.	Noted.	None.	022/22

Question 24: Please give us your views on proposed Policy DM21 – Advertisements				
Response from:	Comments	LPA Response	Action	Ref
Highways England	<ul style="list-style-type: none"> <li>- Highways England would be supportive of a policy which provides greater detail and guidance in determining decisions on relevant planning applications for advertisements, in relation to road safety.</li> <li>- Ongoing consultation on the drafting of this policy, to mitigate the potential for any adverse impacts on the safety and functionality of the SRN would be desirable.</li> </ul>	Noted. The proposed policy for Advertisement (DM7) seeks to ensure that they are designed to a high standard and are suitably located, sited and designed to have no detrimental impact on public and highway safety or to the amenity of the area.	None. Comments have been taken into account and incorporated into proposed policy.	010/6
Turley on behalf of Aberdeen Asset Management	<ul style="list-style-type: none"> <li>- Policies of particular interest to AAM are proposed policies DM21 'Advertisements' and DM23 'Design'.</li> <li>- The Council should seek to ensure that there is sufficient flexibility within the policies to ensure that developers are not overly restricted in what they are able to do.</li> </ul>	Noted. The proposed policy on Advertisements strikes the right balance between flexibility and protection of the character of buildings and the surrounding area.	None.	013/2
Steve George, Managing Director, Signature Outdoor	<ul style="list-style-type: none"> <li>- BCC's objective, in our view, has been to develop futuristic iconic displays in city centre locations.</li> <li>- The balance of providing social and commercial opportunities through the network has seen the reduction of overall displays and the eradication of traditional displays must be considered as progress.</li> </ul>	Noted.	None.	017/1
Turley on behalf of Calthorpe Estates	<ul style="list-style-type: none"> <li>- 'Advertisements' should be efficient, effective and simple in concept and operation.</li> <li>- Advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to detailed assessment.</li> <li>- Advertisements should be subject to control only in the interests of amenity and public safety.</li> </ul>	Noted. As well as public safety and amenity the proposed policy seeks to ensure that advertisements are well designed and relate well in scale and character to a building or surrounding area.	None.	019/4
Primesight	<ul style="list-style-type: none"> <li>- Care must be taken to ensure that such policies do not conflict with the strict requirements of the 1990 (controlled in the interests of amenity and public safety).</li> <li>- The promotion of innovation in advertising and signage in the interests of amenity and public safety</li> <li>- Recognition of the positive role that advertising can play when appropriately designed and sited.</li> <li>- Recognition of the existing amenity of a site and street scene when assessing the relative impact of a</li> </ul>	Noted. As well as public safety and amenity the proposed policy seeks to ensure that advertisements are well designed and relate well in scale and character to the building/ structure it is located on and the surrounding area.	None.	021/2

	proposed advertisement scheme.			
Susan Fleming on behalf of Clear Channel UK Ltd	- The Development Plan and subsequent policy adopted must not constrain or prevent sensible large format media/digital advertising	The proposed policy will not constrain advertisements but ensure that advertisements are well designed, relate well in scale and character to a building or surrounding area and are suitably located, sited and designed having no detrimental impact on public and highway safety or to the amenity of the area.	None.	025/5
Alvechurch Parish Council	- Masts visible from the Alvechurch Parish or adjoining authority could have a possible negative impact	Noted.	None.	022/23
<b>Question 25: Please give us your views on proposed Policy DM22 – Places of Worship</b>				
Response from:	Comments	LPA Response	Action	Ref
None	None			
<b>Question 26: Please give us your views on proposed Policy DM23 – Design</b>				
Response from:	Comments	LPA Response	Action	Ref
Environment Agency	<ul style="list-style-type: none"> <li>- Policy DM23 recommend consideration of how developments will interact with rivers and streams that flow through their boundaries in order to adequately integrate them.</li> <li>- Should build upon and provide further clarity to the requirements of BDP Policy TP6.</li> <li>- This policy should be drafted in consultation with your Lead Local Flood Authority who have responsibility for maintaining Ordinary Watercourses within the city.</li> </ul>	Detailed design guidance on how development should be designed to contribute to the green and blue infrastructure in the city will be contained within the emerging Birmingham Design Guide.	Comments to be taken into account in the Birmingham Design Guide.	012/3
Turley on behalf of Aberdeen Asset Management	- Proposed policy DM23 is of particular interest to AAM given the central location of City Centre House in the retail core.	Noted.	None.	013/3
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	<ul style="list-style-type: none"> <li>- The PCCWM supports Policy DM23 Design in its consideration of crime and disorder.</li> <li>- Requirements for proposals to meet 'Secured by Design' principles when considering elements such as shop fronts, housing, tall buildings, hard and soft landscaping etc. would be welcomed.</li> </ul>	See response to 016/2	See response to 016/2	016/7

Turley on behalf of Calthorpe Estates	<ul style="list-style-type: none"> <li>- Policy DM23, is of particular interest given the proposals identified in the Edgbaston Planning Framework.</li> <li>- The policies need to be sufficiently flexible as to respond to areas historic character and of retailing.</li> </ul>	Noted. A policy for Design is no longer proposed in the Preferred Options Document as it is considered to be covered by BDP Policy PG3 Place-making. Detailed design guidance will be provided through the emerging Birmingham Design Guide.	None. Detailed design guidance will be provided through the emerging Birmingham Design Guide.	019/5
Primesight	<ul style="list-style-type: none"> <li>- An overarching design policy that is clearly integrated with advertisement policy is welcomed.</li> </ul>	Noted. A policy for Design is no longer proposed in the Preferred Options Document as it is considered to be covered by BDP Policy PG3 Place-making. Detailed design guidance will be provided through the emerging Birmingham Design Guide.	None. Detailed design guidance will be provided through the emerging Birmingham Design Guide.	021/3
Alvechurch Parish Council	<ul style="list-style-type: none"> <li>- Properties close to the Birmingham boundary in Alvechurch Parish or adjoining authority could be thought as having a potential to be negatively affected by design.</li> </ul>	Noted.	None.	022/24

**Question 27: Please give us your views on proposed Policy DM24 – Residential Amenity and Space Standards**

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	<ul style="list-style-type: none"> <li>- Agree.</li> </ul>	Noted.	None.	022/25

**Question 28: Please give us your views on Enforcement**

Response from:	Comments	LPA Response	Action	Ref
Selly Park Property Owners' Association.	<ul style="list-style-type: none"> <li>- Council should continue to take action to prevent the continuation of development where breaches in planning regulations have occurred.</li> <li>- Where an applicant seeks retrospective consent, development should be prevented until this is approved.</li> <li>- Council to make full use of powers to prevent unauthorised development and curb flagrant abuses as required, considering the merits of each case individually</li> <li>- Local interest groups to be recognised as a good source of information 'on the ground' to 'police' unauthorised developments in an area.</li> </ul>	Noted. A policy for Enforcement is no longer proposed in the Preferred Options Document. The Council instead will be preparing a Local Enforcement Plan which will set out its policy and procedure for enforcing planning control and handling planning enforcement issues.	None.	006/7
Alvechurch Parish Council	<ul style="list-style-type: none"> <li>- Supported, if enforcement is carried out properly on any development that may negatively impact on</li> </ul>	Noted.	None.	022/26

	bordering authority properties.			
<b>Question 29: Do you have any comments about the assessment of existing policies in Appendix 1?</b>				
Response from:	Comments	LPA Response	Action	Ref
Dr Mike Hodder on behalf of Council for British Archaeology, West Midlands	<ul style="list-style-type: none"> <li>- The retention of the Archaeology Strategy SPG and the Regeneration through Conservation SPG is welcomed</li> <li>- The Archaeology Strategy SPG, like the Regeneration through Conservation SPG, should be absorbed within, and superseded by, the Historic Environment SPD when that is produced.</li> </ul>	The Archaeology Strategy SPG and the Regeneration through Conservation SPG will be superseded by the Birmingham Design Guide SPD once adopted.	Comments to be taken into account in the Birmingham Design Guide.	015/3
Tony Thapar on behalf of Moseley Regeneration Group	<ul style="list-style-type: none"> <li>- Concerned with conservation of the Moseley character</li> <li>- Ensure that there is a diverse range of housing tenures in the neighbourhood.</li> <li>- Concerned with revoking area of restraint for Moseley/ Sparkbrook.</li> </ul>	<p>Policies in the BDP seek to value, protect, enhance and manage the historic environment. The Moseley SPD, adopted in 2014, sets out a vision for Moseley. One of the objectives is to protect its historical legacy. The Moseley Regeneration Group has led on the preparation of the SPD and the development of detailed guidance in relation to the protecting and enhancing the character of Moseley.</p> <p>BDP policies TP27 and TP30 require development to contribute to creating sustainable neighbourhoods characterised by a wide choice of housing sizes, types and tenures to ensure balanced communities.</p> <p>The Areas of Restraint are very out dated and can only be afforded limited weight. It is considered that the issues which the Areas of Restraint seek to address can be adequately covered by existing BDP policies and the proposed policies in the Preferred Options Document namely BDP Policy TP27, TP30, PG3, DM2, DM10, DM13 and DM14.</p>	None.	027/1
Primesight	<ul style="list-style-type: none"> <li>- It is proposed to revoke this SPG rather than update it. It is unclear why a different approach has been taken to that of the Large Format Banners SPD, which on the face of it performs a comparable role. We look forward to receiving the consultation on the draft of the section to be retained in the new policy DM21.</li> </ul>	The Location of Advertisement Hoardings SPG is regarded as being out-of-date, as it does not address more recent developments such as digital media. Some of the content should be included in the DPD policy.	None.	021/4
<b>Question 30: Do you have any other comments? For example, do you think we have omitted anything, or are there any alternative options?</b>				
Response from:	Comments	LPA Response	Action	Ref
North Warwickshire Borough Council	<ul style="list-style-type: none"> <li>- Possible strategic issues relating to policies DM04/06/09/10/11/07 and implementation arising</li> </ul>	Noted	An ongoing dialogue with NWBC will be	001/1

	from the cumulative impact of development to the east of Birmingham.		required.	
Stafford Borough Council	- Stafford Borough Council do not have any key issues or concerns with the DPD.	Noted.	None.	004/1
The Coal Authority	- We have no specific comments to make at this stage.	Noted.	None.	005/1
Historic England	- Historic England welcomes the continued reference and commitment to the preparation of a Historic Environment SPD to enable the effective delivery of Policy TP12 of the BDP.	Detailed design guidance on how development should be designed to value, protect, enhance and manage the historic environment will be contained within the emerging Birmingham Design Guide.	Comments to be taken into account in the Birmingham Design Guide.	003/1
Environment Agency	<ul style="list-style-type: none"> <li>- Suggestion of an additional policy entitled 'Environmental Protection – Water' as to build on BDP Policy TP6.</li> <li>- Policies should ensure that development does not comprise the ability to meet the required WFD objective of Good Status. To accomplish this we recommend:</li> <li>- A Water Cycle Study to pull together all the available information on water resource availability and water quality to inform detailed development management policies. This should be undertaken in liaison with Severn Trent Water and the Environment Agency with reference to the Humber River Basin Management Plan (RBMP).</li> <li>- A policy is required regarding foul drainage infrastructure. The increased volume of waste water and sewage effluent produced by the proposed additional 50,000 dwellings will need to be treated to a high enough standard, it is likely that a blanket policy is required to cover all developments and ensure the sewerage system has adequate capacity to manage any additional flows. We suggest the following condition wording to be included within this DPD, as supported by Severn Trent water's Hearing Statement.</li> </ul>	BDP Policy TP6 (as modified) provides city-wide strategic policy on flood risk and the water environment. Consequently, an additional policy as suggested is not considered necessary.	None.	012/4
Frankley Parish Council	<ul style="list-style-type: none"> <li>- Brownfield across Greater Birmingham and Solihull LEP and the Black Country Authorities should be utilised prior to Green Belt.</li> <li>- Sites within these areas and those within the Authorities identified in the Duty to Co-operate as having capacity for housing should be examined. Deliverable / developable land in the Black Country provides capacity for around 65,000 dwellings,</li> </ul>	Comments are noted. However, this repeats comments made in connection with the Birmingham Development Plan Modifications, and does not relate to the content or purpose of the DM DPD.	None.	002/1

	<ul style="list-style-type: none"> <li>- offering land for employment and housing.</li> <li>- The projected housing numbers should be reviewed to ensure they are accurate. Many of the reports regarding migration are 5 years old. Until the population statistics and housing requirements are justified, the Green Belt should remain untouched.</li> </ul>			
Selly Park Property Owners' Association.	<ul style="list-style-type: none"> <li>- Concerns surrounding the concentration of student development in Selly Oak destroying neighbourhood character. A more balanced approach to land-use would be welcomed</li> <li>- Car parking concerns arising from purpose built student housing developments that have no associated parking facilities.</li> </ul>	Noted. The BDP contains a policy in relation to proposals for purpose built student accommodation (Policy TP33 Student accommodation). Development must have an unacceptable impact on the local neighbourhood and residential amenity. As set out in the Preferred Options Document, all should ensure that the operational and parking needs of development are met and avoid highway safety problems and protect the local amenity and character of the area.	None.	006/8
Lichfield District Council	<ul style="list-style-type: none"> <li>- We have no issues to raise.</li> </ul>	Noted.	None.	008/1
Health & Safety Executive	<ul style="list-style-type: none"> <li>- When consulted on land-use planning matters, HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard installations and major accident hazard pipelines (MAHPs) is achieved.</li> <li>- Detailed technical advice provided.</li> </ul>	Noted. Supporting text to the proposed policy DM3 land affected by contamination and hazardous substances states that decisions will take into account the advice of the HSE, together with guidance in HSE's Land Use Planning Methodology.	Comments taken into account in proposed policy DM3 land affected by contamination and hazardous substances	007/1
Sandwell MBC	<ul style="list-style-type: none"> <li>- We do not feel this DPD raises any strategic issues.</li> </ul>	Noted.	None.	009/1
BCC Transportation	<ul style="list-style-type: none"> <li>- Addition of a transport policy to address detailed considerations in respect of planning applications, planning conditions, car parks, the Parking Guidelines SPD and potential Travel Plans SPD.</li> </ul>	Noted. Comments taken into account in proposed policy DM13 Highway Safety and Access and DM14 Parking and Servicing.	Comments taken into account in proposed policy DM13 Highway Safety and Access and DM14 Parking and Servicing.	Internal
Dr Mike Hodder on behalf of Council for British Archaeology, West Midlands	<ul style="list-style-type: none"> <li>- Suggest that the DPD contains cross-references to BDP policies and a table, similar to Table 3 in the Appendix of the consultation document, which lists topics that are not included in the Development Management DPD because they are covered by BDP policies.</li> </ul>	Cross reference to relevant BDP and other local plan policies and guidance has been included. An appendix in the Preferred Options Document lists the topics that are not included in the Preferred Options Document.	No further action. Comments have been taken into account.	015/4
Natural England	<ul style="list-style-type: none"> <li>- Natural England does not consider that this Development Management DPD poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation. This does not mean there are no impacts on the natural environment.</li> </ul>	Noted.	None. Natural England is a Specific Consultation Body and will continue to be consulted in accordance with the Development Plan	020/1

			Regulations.	
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	<ul style="list-style-type: none"> <li>- Additional policies requested (see below)</li> <li>- Development management policies specific to Listed Buildings and Conservation Areas. Consideration could be given to the use of alternative materials and/or artefacts which are less likely to be vulnerable to repeat theft. The policy should suggest the use of 'alternative' materials to replace building materials and artefacts stolen to reduce crime and the fear of crime</li> <li>- Policies requiring a comprehensive maintenance programme to offer sustainability for buildings once they have been constructed, this might include: The regular pruning and trimming of trees and bushes to encourage surveillance and prevent concealment, the removal of graffiti and signs of vandalism, regular litter and waste patrols.</li> <li>- Another recommendation includes the formulation of a policy, SPD, or model conditions that seeks to control the design and location of ATMs. Examples of 'model' conditions include, adequate lighting, defensible space, CCTV, anti-ram barriers, dedicated parking areas.</li> </ul>	The requirement for development to create safe environments that design out crime and promote natural surveillance and positive social interaction is already provided through BDP Policy PG3 Place making. Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	016/8
Severn Trent Water	<ul style="list-style-type: none"> <li>- No specific comments to make, but please keep us informed.</li> </ul>	Noted.	Consult at next stage of consultation.	018/1
Turley on behalf of Calthorpe Estates	<ul style="list-style-type: none"> <li>- DM03 and DM11 should be sufficiently flexible to ensure that high quality niche offerings are not unduly restricted by blanket policies intended to deal with more standard / typical developments as to create a vibrant urban village.</li> <li>- The DPD should ensure that there is sufficient flexibility creating a more interesting built environment befitting of a world class city.</li> </ul>	The proposed draft policies are unlikely to restrict niche offerings in any way.	None.	019/6
Alvechurch Parish Council	<ul style="list-style-type: none"> <li>- No Transport policy to consider cross boundary transport integration.</li> </ul>	Cross boundary transport integration is a strategic planning consideration which is addressed in the BDP.	None.	022/27
The Moseley Society	<ul style="list-style-type: none"> <li>- We will be very interested to see the detailed policies when they are published for consultation.</li> <li>- We welcome a new statement on Enforcement and hope that enforcement receives sufficient resources.</li> </ul>	Noted. A policy for Enforcement is no longer proposed in the Preferred Options Document. The Council instead will be preparing a Local Enforcement Plan which will set out its policy and procedure for enforcing planning control and handling planning enforcement issues.	None.	023/1
Castle Bromwich Parish Council	<ul style="list-style-type: none"> <li>- Councillors to reply individually to consultations rather than submit a 'parish council' view.</li> </ul>	Noted.	None.	026/1

## Appendix G

### Regulation 18 (Preferred Options) Consultation Responses

Development Management in Birmingham Preferred Options Consultation: Summary of comments and BCC Response					
General Comments regarding Development Management DPD and SA					
Response from:	Support Policy Approach?	Comments and Main Issues Raised	LPA Response	Action	Ref
Jane Harding from Birmingham Trees for Life	N/A	<ul style="list-style-type: none"> <li>- Green infrastructure is a crucial element of high quality urban design and its importance cannot be over-stated.</li> <li>- Ensure that green infrastructure is central to all development in the city, especially the city centre and immediate surrounding areas.</li> </ul>	Noted. Policies in the adopted BDP seek to protect and enhance the green infrastructure network and biodiversity and geodiversity in the city (policies TP7 and TP8).	No further action.	008/16
Jonathan Lee	N/A	<ul style="list-style-type: none"> <li>- It would be better to separate out the HMO section into a separate consultation as residents are passionate about this subject.</li> <li>- I think this very important subject seems to be a little buried in the wider consultation but I wholeheartedly appreciate the opportunity to input into the process and agree with the Council's proposed policies.</li> </ul>	Noted. The DMB will provide a single source point for all development management policies which can be read in conjunction with each other. Separating out the HMO policy from the other development management policies would not be considered useful.	No further action.	
Scott Hewer	N/A	<ul style="list-style-type: none"> <li>- Please make the city more cycle friendly and with MUCH better public transport- that's the only way to lower pollution and create a greener, more inviting and pleasant city for all.</li> </ul>	Noted. The city's transport vision is set out in the Birmingham Development Plan (BDP), Birmingham Connected and other documents such as the Walking and Cycling Strategy and Infrastructure Plan. The adopted BDP sets out the key policies in relation to the establishment of a sustainable transport network and promotes public transport (TP41), walking (TP39), cycling (TP40), the use of low emission vehicles (TP43) and the use of technology to help users navigate and explore the city by all modes of transport.	No further action.	014/16
Iris Bertz	N/A	<ul style="list-style-type: none"> <li>- The limiting of HMO is really important to sustain and improve the quality of live in Birmingham.</li> </ul>	Noted.	No further action.	015/16

Susan Lane	N/A	<ul style="list-style-type: none"> <li>- Focus on new developments leaves an open question about what already exists that may not meet this standard or be creating a public nuisance that could be ameliorated</li> <li>- Enforcement of standards in existing developments may be more critical for quality of life for most people than this plan</li> <li>- No sense of the Council taking initiatives to create change and development in this document</li> <li>- More weight/focus should be given to site around the city that have been neglected or abandoned</li> <li>- There should be discussion of how the Commonwealth Games developments may influence the delivery of this plan</li> <li>- No sense of the complexity and challenge of the city's diversity of needs in the plan</li> <li>- Good aspirations but will be difficult in practice without more neighbourhood engagements. Needs indication of how this might be achieved.</li> <li>- Document is not user friendly. Needs brief summary/conclusions.</li> <li>- More explanation of how the proposals will make the city a better place to live and work in long term/future generations</li> </ul>	<p>Noted. Planning enforcement is undertaken in the event of a breach of planning control. As explained in the Introduction to the document the purpose of the DMB is to provide detailed development management policies which are non-strategic and provide detailed often criteria based policies for specific types of development. The policies will give effect to, and support, the strategic policies set out in the Birmingham Development Plan (BDP), adopted in January 2017.</p> <p>Para 1.9 explains the structure of the document. Each policy begins with an introduction setting out the purpose of the policy.</p>	No further action.	019/16
Helena France	N/A	<ul style="list-style-type: none"> <li>- As your policy says a concentration of more than 10% of properties in a radius of 100 metres is detrimental to the community. Current concentration of HMOs in Selbourne Rd, Handsworth wood Rd, Endwood Court Rd triangle is currently 30% + with a high % of these being Supported Living. This is leading to families moving out of the area - Extra pressure on Police, Health Providers, Refuse Collection - Tensions between residents - Pressure on Parking - Unsuitable levels of support for the Supported Living Residents</li> </ul>	<p>Noted. Consideration will be given to how planning applications will be assessed in such scenarios.</p>	No further action.	022/16
Devinder Kumar from Reservoir Residents Association	N/A	<ul style="list-style-type: none"> <li>- Emerging issues of office-to-residential conversions</li> <li>- Request department engages with their peers in other cities to establish emerging issues and trends and address these in the DMB and BDP</li> <li>- Proposes Birmingham to apply for an Article 4 direction for removing permitted development rights to convert use Class B1[a] to C3, C4 or HMO (sui generis) in areas where there is already a cumulative overconcentration of HMO, class N exempt properties or PBSA development.</li> <li>- Most marked increase to housing stock was in "change of use" with many offices converted to flats. Suggest</li> </ul>	<p>Birmingham is part of the Core Cities Group and regularly engages with other Core Cities on a wide range of matters.</p> <p>The City Council's Cabinet took a decision at a Cabinet meeting on 14 May to apply a City-wide Article 4 Direction in relation to small HMOs with the effect of removing permitted development rights from C3 use to C4 use. A non-immediate Article 4 Direction was recommended and accepted by Cabinet in order to negate the risks of compensation claims made to the Council as a result of any</p>	No further action.	025/16

		<p>that this is partly driven by article 4 directions on HMO.</p> <ul style="list-style-type: none"> <li>- Many conversions of offices into intensive accommodation with boom partly down to new "permitted development rights, resulting in many unfit conversions and overconcentration similar to HMOs. These converted homes under PD do not have to meet minimum floor area standards and do not have to include any affordable housing</li> <li>- Completely support the Council's proposals for a city-wide article 4 direction on HMO, albeit with a few additional conditions/stronger wording and criteria against which applications are considered.</li> <li>- Cumulative effect of class N exemptions, HMO, PBSA and office-to-residential should be used as criteria against which planning application are judged.</li> <li>- Precedence of making a non-immediate Article 4 to remove the permitted development rights for change of use from office to residential. Councils in Hackney and Manchester are currently consulting on this.</li> </ul>	loss of expenditure or abortive costs incurred as a result on the Article 4 Direction.		
Michael William Reed	N/A	<ul style="list-style-type: none"> <li>- Plan seems to focus on the city centre not the whole city with a lack of emphasis on communities and their needs</li> <li>- Plan seems impractical given the current financial and resources position of the council.</li> </ul>	The DMB policies are to be applied city wide unless specified otherwise.	No further action.	035/16
Hazel McDowall from Natural England	N/A	<ul style="list-style-type: none"> <li>- Natural England welcome that many of the comments in their response to the Scoping Report (August 2018) have been taken into account.</li> <li>- However, we note that the Habitats Regulation Assessment (HRA) summary that is referred to in the Sustainability Appraisal paragraph 1.6 does not seem to be at paragraph 5.8 as indicated. The document we are viewing from the web site ends at paragraph 5.4.</li> </ul>	<p>Noted. The drafting error will be corrected in the Publication Version of the SA by way of specific reference to the 2013 HRA prepared for the BDP (link below).  <a href="https://www.birmingham.gov.uk/download/downloads/id/1523/sub6_pre-submission_habitat_regulations_assessment_2013.pdf">https://www.birmingham.gov.uk/download/downloads/id/1523/sub6_pre-submission_habitat_regulations_assessment_2013.pdf</a></p>	The drafting error will be corrected in the Publication Version of the SA by way of specific reference to the 2013 HRA prepared for the BDP (link below). <a href="https://www.birmingham.gov.uk/download/downloads/id/1523/sub6_pre-submission_habitat_regulations_assessment_2013.pdf">https://www.birmingham.gov.uk/download/downloads/id/1523/sub6_pre-submission_habitat_regulations_assessment_2013.pdf</a>	040/16
Samantha Pritchard from Birmingham and Black Country Local Nature Partnership	N/A	<ul style="list-style-type: none"> <li>- B&amp;BC LNP are disappointed the documents does not include policies on biodiversity and heritage and sustainable urban drainage arrangements.</li> <li>a) Inclusion of which would protect biodiversity from direct and indirect impacts of new developments and support the incorporation and creation of a robust ecological network within the Birmingham city centre</li> <li>b) LNP wishes to bring attention to the spring statement 2019 published by the Government on 13th March which confirmed that the Government will use the forthcoming Environment Bill to mandate Biodiversity net gain for development in England. As such although full details of the mandate has not yet</li> </ul>	<p>Noted. Policy DM4 has been amended to strengthen references to ecological networks and biodiversity net gain. Biodiversity, heritage and sustainable urban drainage are addressed in the BDP in policies TP8, T12 and TP6 respectively Further guidance on these issues will also be included in the emerging Birmingham Design Guide SPD, and is already available in the Council publication <i>Sustainable Drainage: Guide to Design, Adoption and Maintenance</i> (June 2015). The need for specific policy/guidance on the Council's approach to biodiversity net gain will</p>	<p>Amend now point 1 and 2 of the policy:</p> <ol style="list-style-type: none"> <li>1. All developments must take opportunities to provide high quality landscapes <b>and townscapes</b> that enhance existing landscape character and the green infrastructure network, contributing to the creation of high quality places <b>and a coherent and resilient ecological network</b>.</li> <li>2. The composition of the <b>proposed</b> landscape <b>should shall</b> be appropriate to</li> </ol>	041/16

		<p>been provided. The LNP would encourage the inclusion of a policy covering net biodiversity gain for new developments.</p>	<p>be reviewed when details of mandatory requirements are published as part of the forthcoming Environment Bill.</p>	<p>the setting and the development, as set out in a Landscape Plan*, with opportunities taken to maximise the provision of new trees and other green infrastructure, <a href="#">create or enhance links from the site to adjacent green infrastructure and support objectives for habitat creation and enhancement, as set out in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022 and subsequent revisions.</a></p> <p>Amend now paragraph 2.33 to:</p> <p>Maintaining and expanding the green infrastructure network throughout Birmingham is a key part of the City's growth agenda, <a href="#">and provides net gains for biodiversity.</a> Green landscaping (including trees, hedgerows and woodland) forms a critical part of this network and provide a multitude of benefits, having a positive impact on human health and improving the quality of visual amenity and ecological networks. This policy seeks to ensure that landscaping is an integral part of the overall design of development. It also sets out criteria for how existing landscaping should be considered in development proposals.</p> <p>Amend now paragraph 2.35 to:</p> <p>New development has a clear role in supporting the City's approach to green infrastructure, and can contribute to and enhance the landscape, provide biodiversity net gain and help to reduce the impact of climate change. Each development site will be able to contribute to the green infrastructure network in appropriate ways reflecting the site context and location. <a href="#">The ecological network is currently described in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022, which identifies opportunities for habitat creation,</a></p>	
--	--	--	--	---	--



				<p><u>restoration and enhancement within Core Ecological Areas, Ecological Linking Areas and Ecological Opportunity Areas. This strategy, and subsequent revisions, should be referenced to ensure new development is in keeping with the surrounding landscape and supports the maintenance of a resilient and coherent ecological network.</u></p> <p>TP8 Biodiversity and Geodiversity will be added to the Policy Links.</p>	
Samantha Pritchard from The Wildlife Trust for Birmingham and Black Country	N/A	<ul style="list-style-type: none"> <li>- Wildlife Trust notes that the document does not include policies on biodiversity, which would be designed to support the protection of biodiversity from both direct and indirect impacts of new developments.</li> <li>- Document should support the incorporation and creation of a robust ecological network within the Birmingham city centre which would retain the existing green infrastructure while supporting the creation of further infrastructure</li> <li>- Wildlife Trust would encourage the inclusion of a policy covering net biodiversity gain for new developments, with reference to spring statement 2019 published by the Government on 13th March which confirmed that the Government will use the forthcoming Environment Bill to mandate Biodiversity net gain for development in England</li> </ul>	<p>Noted. Policy DM4 has been amended to strengthen references to ecological networks and biodiversity net gain. Biodiversity is specifically addressed in BDP policy TP8, and further guidance on protecting and enhancing biodiversity will also be included in the emerging Birmingham Design Guide SPD. The need for more specific policy/guidance on the Council's approach to biodiversity net gain will be reviewed when details of mandatory requirements are published as part of the forthcoming Environment Bill.</p>	<p>Amend now point 1 and 2 of the policy:</p> <ol style="list-style-type: none"> <li>1. All developments must take opportunities to provide high quality landscapes <u>and townscapes</u> that enhance existing landscape character and the green infrastructure network, contributing to the creation of high quality places <u>and a coherent and resilient ecological network.</u></li> <li>2. The composition of the <u>proposed</u> landscape <u>should shall</u> be appropriate to the setting and the development, as set out in a Landscape Plan*, with opportunities taken to maximise the provision of new trees and other green infrastructure, <u>create or enhance links from the site to adjacent green infrastructure and support objectives for habitat creation and enhancement, as set out in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022 and subsequent revisions.</u></li> </ol> <p>Amend now paragraph 2.33 to:</p> <p>Maintaining and expanding the green infrastructure network throughout Birmingham is a key part of the City's growth agenda, <u>and provides net gains for biodiversity.</u> Green landscaping (including trees, hedgerows and woodland) forms a critical part of this network and provide a</p>	042/16

				<p>multitude of benefits, having a positive impact on human health and improving the quality of visual amenity and ecological networks. This policy seeks to ensure that landscaping is an integral part of the overall design of development. It also sets out criteria for how existing landscaping should be considered in development proposals.</p> <p>Amend now paragraph 2.35 to:</p> <p>New development has a clear role in supporting the City's approach to green infrastructure, and can contribute to and enhance the landscape, provide biodiversity net gain and help to reduce the impact of climate change. Each development site will be able to contribute to the green infrastructure network in appropriate ways reflecting the site context and location. <u>The ecological network is currently described in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022, which identifies opportunities for habitat creation, restoration and enhancement within Core Ecological Areas, Ecological Linking Areas and Ecological Opportunity Areas. This strategy, and subsequent revisions, should be referenced to ensure new development is in keeping with the surrounding landscape and supports the maintenance of a resilient and coherent ecological network.</u></p> <p>TP8 Biodiversity and Geodiversity will be added to the Policy Links.</p>	
Historic England		- We note the attention to safeguarding cultural heritage in the Sustainability Appraisal and welcome the DMBs consideration of the historic environment in relation to Policy DM5 Light pollution, Policy DM7 Advertisements, and Policy DM15 Telecommunications.	Support noted.	No further action.	050/16
Tyler Parker		- CCWMP welcomes opportunity to become actively	Support noted.	No further action.	051/16

Planning and Architecture – on behalf of Chief Constable of West Midlands Police	<ul style="list-style-type: none"> <li>- involved in the policy formation process.</li> <li>- Supports the objectives/policies that refer in their wording to safety and security, including crime fear of crime and anti-social behaviour</li> <li>- CCWMP objects to the omission of certain policy areas from the saved policies of the 2005 UDP, namely those within Chapter 8 and paragraphs 3.14-3.14D, and without changes the CCWMP considers the document to be unsound.</li> <li>- Lack of reference to a policy referring to restaurants, bars, public houses and hot food takeaways and potential crime is regrettable – a specifically worded policy is required which should also refer to the Council attaching conditions to ensure no demonstrable harm to nearby residents.</li> <li>- Objects to the omission of: Listed Buildings and Conservation Areas; Maintenance following completion of development; Automatic Teller Machines (ATM)</li> </ul>	The reasons for the omission of certain policies from the saved policies of the 2005 UDP, namely those within Chapter 8 and paragraphs 3.14-3.14D was set out in the Issues and Options Document and subsequently the reasons for taking forward certain policies proposed in the Issues and Options Document is set out in Appendix 3 of the Preferred Options Document. Policy in relation to the historic environment (including Listed Buildings and Conservation Areas) is contained in the adopted Birmingham Development Plan. The saved 2005 UDP policies did not contain a policy in relation to 'Maintenance' or 'ATMs.'		
Conservative Group	<ul style="list-style-type: none"> <li>- Concerns are raised about policies being dropped and they should not be removed unless legal advice can be provided that doing so will not weaken planning</li> <li>- Strong requirements should be included in main policies</li> <li>- New planning policy should reflect the protection to existing housing stock</li> <li>- Policy on Shisha Loungers should remain as a standalone policy</li> </ul>	The reasons for the omission of certain policies from the saved policies of the 2005 UDP, namely those within Chapter 8 and paragraphs 3.14-3.14D was set out in the Issues and Options Document and subsequently the reasons for taking forward certain policies proposed in the Issues and Options Document is set out in Appendix 3 of the Preferred Options Document. Policy in relation to the protection of the existing housing stock is contained in the adopted BDP. (Policy TP35)	No further action.	052/16
Savills on behalf of Langley Sutton Coldfield Consortium	<ul style="list-style-type: none"> <li>- Consortium considers that the Langley development and other sites with a site-specific SPD should be excluded from the application of policies set out in Development Management DPD</li> <li>- Consortium considers that the rigid application of all proposed new city-wide development management policies to Langley is not appropriate</li> </ul>	Disagree, the Langley SPD clearly states that its purpose is to add detail and provide guidance to the Birmingham Development Plan. It states "Alongside other policies and guidance, it is a material consideration when determining planning applications on this site."	No further action.	058/16
Dr Mike Hodder on behalf of Council for British Archaeology	<ul style="list-style-type: none"> <li>- A list of development management policies within the BDP (including those relating to the historic environment) should be included in an Appendix to Development Management in Birmingham</li> <li>- Sustainability Appraisal interim sustainability report: Table 2.1 Local Plans, Programmes and Strategies should include historic environment documents- Archaeology Strategy SPG and Regeneration through Conservation SPG</li> </ul>	All of the thematic policies in the BDP are development management policies. Cross reference to the BDP has been made in the DMB. Noted. The historic environment documents will be included in Table 2.1 of the SA.	The historic environment documents will be included in Table 2.1 of the SA.	059/16

Reservoir Residents Association		<ul style="list-style-type: none"> <li>- Document should address the emerging issues of office to residential conversions</li> <li>- Reservoir Residents Association proposes that Birmingham automatically applies for an Article 4 direction for removing permitted development rights to convert use Class B1[a] to C3, C4 or HMO (sui generis) in areas where there is already a cumulative overconcentration of HMO, class N exempt properties or PBSA development.</li> <li>- We support completely the Council's proposals for a city-wide article 4 direction on HMO, albeit with a few additional conditions/stronger wording and criteria against which applications are considered</li> </ul>	See response to 025/16	See 026/16	060/16
Pegasus Group		<ul style="list-style-type: none"> <li>- Concern given that almost four years have elapsed since the original consultation during which time both the national and local policy context has changed significantly.</li> </ul>	Noted. The DMB is being progressed as quickly as possible.	No further action.	064/16
Curdworth Parish Council		<ul style="list-style-type: none"> <li>- Essential that as much local Green Belt as possible is retained as a bulwark against urban sprawl.</li> <li>- Curdworth Parish Council shares one of its boundaries with Birmingham and therefore has major concerns about infrastructure relating to the proposed development site within Walmley</li> <li>- There is an increasing number of HGV's using access to the M42 and M6 toll with roads becoming unfit for purpose</li> <li>- More consideration should be given by planning officers in relation to the pressures on local road networks</li> <li>- Full consideration has been given to the appropriate infrastructure required with regard to doctors' surgeries, dental practices, schools and retail facilities, as neighbouring villages find it difficult meeting the needs of their own residents</li> <li>- Council would like to point out that policies should note that it is vital to retain a "green corridor" between the Birmingham conurbation and North Warwickshire.</li> </ul>	Comments are noted but do not relate to the Development Management in Birmingham Document which is the subject of this consultation.	No further action.	065/16
Canal and River Trust		<ul style="list-style-type: none"> <li>- The Trust welcomes the reference at para 1.7 to encouraging better health and wellbeing. However, rather than just in space/leisure time, additional and amended text should be added at the eighth bullet point to extend into commuting opportunities: "To encourage better health and wellbeing through the</li> </ul>	<p>The objectives are taken from the adopted BDP. Promoting sustainable transport is covered by point 5. Para 1.7 will be re-worded to make clear that these are BDP objectives which the DMB seek to support.</p> <p>Updates on emerging and proposed new</p>	<p>Amend para 1.7 to: The DMB will support the delivery of the BDP objectives for the City.</p> <p>Amend policy to:</p>	066/16

	<p>provision of new and improved recreation, sport, leisure facilities and sustainable travel modes"</p> <ul style="list-style-type: none"> <li>- The objectives at para 1.7 be reviewed as several of them seem to cover matters that are not covered by the proposed DM policies and if referenced in SPDs or existing then this should be made clear.</li> <li>- Trust asks for an update on any emerging or proposed new SPDs, with clarity around the emergence of other local policy documents being referenced if possible.</li> <li>- The Trust would like to note that it is important that good waterside places and design do not just relate to residential development but also to other uses and types of development along waterway corridors.</li> </ul> <p>- Comments on Chapter 2 overall – Land stability:</p> <ol style="list-style-type: none"> <li>a) Should ensure that developments do not in situations that could cause leaks, breaches, collapses etc</li> <li>b) Should ensure that new developments are appropriate for its location in the context of avoiding unacceptable risks from land instability</li> <li>c) Note inferences towards this in DM3 and DM6 however it would be better dealt with separately to cover concerns.</li> </ol> <p>- Water and Drainage:</p> <ol style="list-style-type: none"> <li>a) Disappointed to note that the document does not address these matters. It is important that the environment is protected.</li> <li>b) Ensure that sites are prevented from allowing pollution of the water environment through air borne pollution or water seepage/spillage/run-off and should be considered in relevant detailed policy</li> <li>c) Drainage options should be outlined and chosen to ensure that appropriate management and control mechanisms are put in place.</li> </ol> <p>- Further advice and guidance is needed in regards to heritage. It is possible that canal-related advice is included within a design document and the Trust would like further discussion on this.</p> <p>- Chapter 3 Overall:</p> <ol style="list-style-type: none"> <li>a) Good design policies should apply to the development of employment uses and it is important that the benefits of locations near the canal and river network are maximised</li> </ol>	<p>SPDs can be provided by contacting the Planning Policy Team. Comment on good waterside places and design is noted.</p> <p>Comments on land instability are addressed in response proposed changes to the policy.</p> <p>Policy in relation to the management of flood risk and water resources is contained in the adopted BDP. (Policy TP6)</p> <p>Policy in relation to the historic environment is contained in the adopted BDP (Policy TP 12)</p> <p>Comments noted. The emerging Birmingham Design Guide will provide detailed design guidance to assist with the application of policies.</p> <p>It is considered that existing policies in the BDP adequately promote sustainable transport and cover water borne freight.</p>	<p><b>Policy DM3 –Land affected by contamination, instability and hazardous substances</b></p> <ol style="list-style-type: none"> <li>1. Proposals for new development will need to ensure that risks associated with land contamination and instability are fully investigated and addressed by appropriate measures to minimise or mitigate any harmful effects to human health and the environment within the development and the surrounding area and/ or groundwater.</li> <li>2. All proposals for new development on land which is known to be, or potentially, contaminated or unstable, will be required to submit a preliminary risk assessment, and where appropriate, a risk management and remediation strategy based on detailed site investigation to remove risks to both the development and the surrounding area and/ or groundwater.</li> </ol> <p>Proposals for development of new hazardous installations, or development located within the vicinity of existing hazardous installations, will only be permitted where it is demonstrated that necessary safeguards, in consultation with the HSE, are incorporated to ensure the development is safe; and that it supports the spatial delivery of growth as set out in the Birmingham Development Plan.</p>	
--	---	--	---	--

		<p>b) Policy TP25 refers to strategic matters around tourism and cultural facilities and their detailed design should fall within wider design considerations.</p> <ul style="list-style-type: none"> <li>- More emphasis and direction should be given relating to alternative transport methods.</li> <li>- The strategies in policies TP38-42 are welcomed but largely are not linked to site specific considerations.</li> <li>- Greater provision should be encouraged to assist in travel across a range of modes and routes</li> <li>- Trust considers a policy should exist that sets out a sequential approach to the assessment of transport and connectivity whilst still acknowledging car/parking need. These should include requirements for suitable storage, maintenacne of cycles and other alternative transportation devices.</li> <li>- Information should be provided to residents of sustainable routes</li> <li>- Trust notes the use of digital technology to assist should be incorporated or required.</li> <li>- Further advice on waterborne freight might be encouraged.</li> <li>- Policies should refer to objectives of para 1.7</li> </ul>			
Councillor Lisa Trickett		<ul style="list-style-type: none"> <li>- Main comment and concern in relation to these documents is in terms of the need to address the risks of catastrophic climate change and bring forward action to make this city a zero carbon city. How has this being addressed in these documents – what conditions and requirements are to be set – where do we need wider regulation etc.</li> </ul>	<p>The purpose of this document is to provide detailed development management policies to support the strategic policies set out in the adopted BDP. The BDP contains policies which seek to mitigate and reduce the impacts of climate change (TP1 Reducing the city's carbon footprint), namely polices in relation to the promotion of sustainable transport (TP38-46),adapting to climate change (TP2), Sustainable construction (TP3), Low and zero carbon energy generation (TP4), Low carbon economy (TP5), Management of flood risk and water resources (TP6), Green Infrastructure (TP7) and sustainable management of the city's waste (TP13)</p>	No further action.	069/16



© Wood Environment & Infrastructure Solutions UK Limited

wood.



**wood.**

