

21 February 2020  
Delivered by email

Planning Policy  
Planning and Development  
1 Lancaster Circus  
Birmingham  
B1 1TU

Ref: IM Q3021

Dear Sir / Madam

## **DEVELOPMENT MANAGEMENT IN BIRMINGHAM DEVELOPMENT PLAN DOCUMENT – PUBLICATION VERSION CONSULTATION (REGULATION 19)**

We write on behalf of our client, IM Properties Plc (hereafter referred to as “IM Properties”), in response to the ‘Development Management in Birmingham (“DMP”) Development Plan Document – Publication Version Consultation’ (“the Publication Version”) (October 2019), particularly in the context of the development of Peddimore which now benefits from hybrid planning permission.

### **INTRODUCTION AND BACKGROUND**

IM Properties was appointed as Birmingham City Council’s (“BCC”) development partner for Peddimore in 2018 and is responsible for enabling and servicing the whole of Peddimore and marketing, delivering and managing the first phases of the site. The remaining part(s) will be retained in the control of BCC.

IM Properties and BCC secured hybrid planning permission for a high quality employment park at Peddimore (Ref: 2019/00108/PA) in September 2019. The hybrid planning permission included a condition (i.e. Condition 51) for all future reserved matters submissions to comply with the approved Reserved Matters Design Guide (“RMDG”) (Revision P). The RMDG sets out a framework for the design of all future on-plot development across the site and for consideration of that design at reserved matters stage by BCC.

IM Properties has previously submitted representations to the DMP Preferred Options in March 2019, which should be referred back to by BCC. It is welcomed that a number of the recommendations put forward by IM Properties during the Preferred Options consultation stage have since been considered and incorporated by BCC in the Publication Version.

These representations and those submitted to the Preferred Options examine the emerging development management policies to ensure consistency with the Birmingham Development Plan (“BDP”) 2031, the National Planning Policy Framework (“NPPF”) (February 2019) as well as the RMDG for Peddimore.

9 Colmore Row  
Birmingham  
B3 2BJ

T 0121 233 0902 [turley.co.uk](http://turley.co.uk)

## **DM2 AMENITY**

As previously set out in our representations to the Preferred Options, DM2 fails to offer flexibility in dealing with any adverse impacts on amenity. This has not been addressed in the Publication Version.

Therefore, our previous comments remain relevant, which is that new wording should be inserted into DM2 as follows:

*“New development should seek to reduce and mitigate to a minimum potential adverse impacts on amenity features in the wider area.”*

This recommendation is in accordance with paragraph 180 of the NPPF, whereas the existing wording in the Publication Version provides a more onerous restriction on new development. Paragraph 180 of the NPPF states that likely effects should be taken into account, rather than “...not result in unacceptable adverse impacts...” as currently expressed in DM2.

## **DM4 LANDSCAPING AND TREES**

IM Properties supports the approach taken to ensure new development contributes to and enhances green infrastructure across the city.

In particular, IM Properties welcomes DM4(3) which specifies that development proposals must seek to avoid the loss of, and minimise the risk of harm to, existing trees or woodland which are subject to a Tree Preservation Order. This is appropriately balanced with DM4(5), which specifies that adequate replacement planting will be required to outweigh the harm resulting from loss of trees, woodland or hedgerows.

This addresses the concerns raised by IM Properties at the Preferred Options consultation stage.

## **DM5 LIGHT POLLUTION**

IM Properties agree that appropriate lighting can provide a valuable contribution to making Birmingham a successful, safe and connected place.

In particular, IM Properties welcome the consistency of DM5 with paragraph 180(c) of the NPPF, in which external lighting “must seek to avoid or mitigate any potential adverse impacts” on amenity and public safety.

This addresses the concerns raised by IM Properties at the Preferred Options consultation stage.

## **DM6 NOISE AND VIBRATION**

IM Properties agree that noise and vibration should be managed appropriately to ensure quality of life and working environments, particularly through the mitigation of any impacts.

IM Properties supports the consistency of DM6 with paragraph 180(a) of the NPPF in that where potential adverse noise and vibration impacts are identified, development proposals should set out how such impacts will be reduced and/or mitigated.

However, our previous representations to the Preferred Options still apply in that it remains unclear how BCC will apply the Planning Guidance Note (as referenced at paragraph 2.52 of the Publication Version)

maintained by the Environmental Health Unit as non-statutory guidance to assess and determine planning applications and/or reserved matters. Given the Planning Guidance Note has not been subject to public consultation and does not form part of an adopted development plan or is not contained within an SPD, only limited weight can be attached to this guidance.

## **DM15 PARKING AND SERVICING**

IM Properties continue to support the flexible and balanced approach adopted in Policy DM15 in preventing excessive car parking provision whilst ensuring low on-site provision does not increase on-street parking problems on the surrounding road network.

However, IM Properties contend that the DMP should set out HGV parking standards, as well as the new Parking SPD which will set out the City's parking strategy and revised car parking standards, and that such parking provision should reflect the operational requirements of future tenants.

The emerging Parking SPD should be cross referenced in the implementation section of DM15.

## **CONCLUSION**

IM Properties continue to support the purpose of the DMP and its aim to support the strategic policies set out in the BDP, including Policy GA6 'Peddimore', and to update the development management policies in accordance with the NPPF.

Once adopted, the development management policies will form part of the primary material consideration for future applications for approval of reserved matters at Peddimore. Applications for the approval of reserved matters for the initial phases of employment development at Peddimore are expected to be submitted during 2020.

IM Properties trust that the information provided within these representations, particularly in relation to amenity, noise and vibration are taken into consideration before the DMP DPD is submitted to the Secretary of State, so that the development management policies are sound and do not prejudice the delivery of permitted development.

Yours faithfully

Sam Lake  
**Senior Planner**

sam.lake@turley.co.uk

# Representation Form (Part A)

## Development Management in Birmingham Development Plan Document (DMB)

Publication (Reg. 19) Consultation



(For office use only)

Date Received

Date acknowledged

Ref:

### How to use this Representation Form

Please complete this Part A in full. Please note that anonymous comments cannot be accepted. Then please complete a Part B form for each representation that you wish to make.

The Development Management in Birmingham DPD (DMB), including all supporting and accompanying documentation, is available to view in full online at [www.birmingham.gov.uk/DMB](http://www.birmingham.gov.uk/DMB)

Representations on the Publication version of DMB can be made from **Thursday 9<sup>th</sup> January 2020 to 17:00hrs on Friday 21<sup>st</sup> February 2020**. Please note that the Council is unable to accept representations after this point.

The Council strongly recommends the use of this Representation Form for submitting any comments. This will help to ensure that any formal representations that are made are matters of relevance to the subsequent examination by the Planning Inspectorate – an Inspector will only consider issues relating to the 'soundness' or 'legal compliance' of the DMB at examination.

### **PART A**

#### **1. Personal Details\***

*\* if an agent is appointed, please complete only the Title, Name and Organization boxes below but complete the full contact details of the agent in Section 2*

Title:

First Name:

Last Name:

Job title (where relevant):

Organisation (if relevant): IM Properties Plc

Address Line 1:

Address Line 2:

Town:

County:

Postcode:

Telephone:

Email address:

<b>2. Agent Details*</b> <i>* only complete this section if an agent has been appointed</i>	
Title: Mr	
First Name: Samuel	
Last Name: Lake	
Job title (where relevant):	
Organisation (if relevant): Turley	
Address Line 1: 9 Colmore Row	
Address Line 2:	
Town: Birmingham	County: West Midlands
Postcode: B3 2BJ	Telephone: 0121 233 0902
Email address: sam.lake@turley.co.uk	

<b>3. Requests for Notifications</b>	
<i>This section is for requests to be notified of progress with the DMB for those who are not submitting a formal representation. If you do submit a representation using a part B form then you will automatically be notified of all stages of the DMB and can disregard this section.</i>	
<b>I wish to be notified of the following stages of the DMB (please tick/check all that apply):</b>	
Submission to the Secretary of State for Communities and Local Government Y/N	Y
Publication of the Planning Inspector's Report on the Publication Version Y/N	Y
Adoption by the Council Y/N	Y

<b>4. Declaration</b>	
If you are submitting Part B form(s), please confirm how many:	5
<b>Data Protection</b> The personal information that you provide as part of this representation will only be used by Birmingham City Council for the purposes of preparing this DMB document.	
<b>Declaration:</b> I understand that any representations submitted will be made public and that my personal details will not be passed to any third parties without my prior written consent.	
Name: Samuel Lake	Date: 21/02/2020

Please ensure that you submit this form no later than **17:00hrs** on Friday 21<sup>st</sup> February 2020

Email completed forms to: [planningstrategy@birmingham.gov.uk](mailto:planningstrategy@birmingham.gov.uk)

Post to: Planning Policy, Planning and Development, PO Box 28, Birmingham, B1 1TU.

Tel: 0121 303 4323

# Representation Form (Part B)

## Development Management in Birmingham Development Plan Document (DMB)

Publication (Reg. 19) Consultation



(For office use only)

Date Received

Date acknowledged

Ref:

### How to use this Representation Form

Please complete the Part A (Personal Details) form in full.

Then, please complete this Part B form for each representation that you wish to make. It is important that you identify on this Part B form which part of the DMB (e.g. paragraph and / or policy number) on which you are making the representation. Please use a separate form for each representation that you wish to make.

### PART B

#### 1. Confirmation of Name\*

*\* please print your name on each separate representation (the name should match that entered on the Part A form)*

**Full Name: Samuel Lake**

**Organisation (if relevant): Turley**

#### 2. Your Representation

*Important Note: For each question, please mark with an X, ONE of the available options only. Please complete a separate form for EACH of your comments. Please also refer to the accompanying guidance note for an explanation of the terms used.*

<b>Q1. Do you consider the DMB to be legally compliant?</b>	<b>YES</b>	<b>X</b>	<b>NO</b>	
<b>Q2. Do you consider the DMB to be sound?</b>	<b>YES</b>		<b>NO</b>	<b>X</b>
<b>Q3. Does the DMB comply with the Duty to Cooperate?</b>	<b>YES</b>	<b>X</b>	<b>NO</b>	
<b>Q4. Why do you believe that the DMB is NOT sound?</b>				
a/ It is not positively prepared				
b/ It is not justified				
c/ It is not effective				
d/ It is not consistent with national policy				<b>X</b>
<b>Q5. Which part of the DMB are you commenting on?</b>				
Page Number				

Policy Number	DM2
Paragraph Number	
Table / Figure / Appendix	
Other	

**Q6. Why do you feel that this part of the DMB is not legally compliant, sound or does not comply with the Duty to Cooperate?**

As previously set out in our representations to the Preferred Options, DM2 fails to offer flexibility in dealing with any adverse impacts on amenity. This has not been addressed in the Publication Version.

Therefore, our previous comments remain relevant, which is that new wording should be inserted into DM2 as follows:

*“New development should seek to reduce and mitigate to a minimum potential adverse impacts on amenity features in the wider area.”*

This recommendation is in accordance with paragraph 180 of the NPPF, whereas the existing wording in the Publication Version provides a more onerous restriction on new development. Paragraph 180 of the NPPF states that likely effects should be taken into account, rather than “...not result in unacceptable adverse impacts...” as currently expressed in DM2.

**Q7. What changes do you consider are necessary in order to make the DMB legally compliant, or sound?**

Please see our response to Q6.

**Q8. If your representation is seeking a modification, do you wish to participate at the oral examination (i.e. in person at the hearing sessions rather than via written representations)?**

Yes.

**Q9. Are there any additional comments you would like to make with regard to the DMB?**

No.

### 3. Declaration

**Data Protection**

The personal information that you provide as part of this representation will only be used by Birmingham City Council for the purposes of preparing this DMB document.

**Declaration:**

I understand that any representations submitted will be made public as set out above, and that my personal details will not be passed to any third parties without my prior written consent.

<b>Name: Samuel Lake</b>	<b>Date: 21/02/2020</b>
--------------------------	-------------------------

**Please ensure that you submit this form no later than 17:00hrs on Friday 21<sup>st</sup> February 2020, with an accompanying Part A form completed.**

**Email completed forms to:** [planningstrategy@birmingham.gov.uk](mailto:planningstrategy@birmingham.gov.uk)

**Post to:** Planning Policy, Planning and Development, PO Box 28, Birmingham, B1 1TU.

**Tel:** 0121 303 4323

# Representation Form (Part B)

## Development Management in Birmingham Development Plan Document (DMB)

Publication (Reg. 19) Consultation



(For office use only)

Date Received

Date acknowledged

Ref:

### How to use this Representation Form

Please complete the Part A (Personal Details) form in full.

Then, please complete this Part B form for each representation that you wish to make. It is important that you identify on this Part B form which part of the DMB (e.g. paragraph and / or policy number) on which you are making the representation. Please use a separate form for each representation that you wish to make.

### PART B

#### 1. Confirmation of Name\*

*\* please print your name on each separate representation (the name should match that entered on the Part A form)*

**Full Name: Samuel Lake**

**Organisation (if relevant): Turley**

#### 2. Your Representation

*Important Note: For each question, please mark with an X, ONE of the available options only. Please complete a separate form for EACH of your comments. Please also refer to the accompanying guidance note for an explanation of the terms used.*

<b>Q1. Do you consider the DMB to be legally compliant?</b>	<b>YES</b>	<b>X</b>	<b>NO</b>	
<b>Q2. Do you consider the DMB to be sound?</b>	<b>YES</b>	<b>X</b>	<b>NO</b>	
<b>Q3. Does the DMB comply with the Duty to Cooperate?</b>	<b>YES</b>	<b>X</b>	<b>NO</b>	
<b>Q4. Why do you believe that the DMB is NOT sound?</b>				
a/ It is not positively prepared				
b/ It is not justified				
c/ It is not effective				
d/ It is not consistent with national policy				
<b>Q5. Which part of the DMB are you commenting on?</b>				
Page Number				
Policy Number				DM4
Paragraph Number				

Table / Figure / Appendix	
Other	
<b>Q6. Why do you feel that this part of the DMB is not legally compliant, sound or does not comply with the Duty to Cooperate?</b>	
N/A	
<b>Q7. What changes do you consider are necessary in order to make the DMB legally compliant, or sound?</b>	
N/A	
<b>Q8. If your representation is seeking a modification, do you wish to participate at the oral examination (i.e. in person at the hearing sessions rather than via written representations)?</b>	
N/A	
<b>Q9. Are there any additional comments you would like to make with regard to the DMB?</b>	
<p>IM Properties supports the approach taken to ensure new development contributes to and enhances green infrastructure across the city.</p> <p>In particular, IM Properties welcomes DM4(3) which specifies that development proposals must seek to avoid the loss of, and minimise the risk of harm to, existing trees or woodland which are subject to a Tree Preservation Order. This is appropriately balanced with DM4(5), which specifies that adequate replacement planting will be required to outweigh the harm resulting from loss of trees, woodland or hedgerows.</p> <p>This addresses the concerns raised by IM Properties at the Preferred Options consultation stage.</p>	

<b>3. Declaration</b>	
<p><b>Data Protection</b></p> <p>The personal information that you provide as part of this representation will only be used by Birmingham City Council for the purposes of preparing this DMB document.</p> <p><b>Declaration:</b></p> <p>I understand that any representations submitted will be made public as set out above, and that my personal details will not be passed to any third parties without my prior written consent.</p>	
<b>Name: Samuel Lake</b>	<b>Date: 21/02/2020</b>

Please ensure that you submit this form no later than **17:00hrs** on **Friday 21<sup>st</sup> February 2020**, with an accompanying Part A form completed.

**Email completed forms to:** [planningstrategy@birmingham.gov.uk](mailto:planningstrategy@birmingham.gov.uk)

**Post to:** Planning Policy, Planning and Development, PO Box 28, Birmingham, B1 1TU.

**Tel:** 0121 303 4323

# Representation Form (Part B)

## Development Management in Birmingham Development Plan Document (DMB)

Publication (Reg. 19) Consultation



(For office use only)

Date Received

Date acknowledged

Ref:

### How to use this Representation Form

Please complete the Part A (Personal Details) form in full.

Then, please complete this Part B form for each representation that you wish to make. It is important that you identify on this Part B form which part of the DMB (e.g. paragraph and / or policy number) on which you are making the representation. Please use a separate form for each representation that you wish to make.

### PART B

#### 1. Confirmation of Name\*

*\* please print your name on each separate representation (the name should match that entered on the Part A form)*

**Full Name: Samuel Lake**

**Organisation (if relevant): Turley**

#### 2. Your Representation

*Important Note: For each question, please mark with an X, ONE of the available options only. Please complete a separate form for EACH of your comments. Please also refer to the accompanying guidance note for an explanation of the terms used.*

<b>Q1. Do you consider the DMB to be legally compliant?</b>	<b>YES</b>	<b>X</b>	<b>NO</b>	
<b>Q2. Do you consider the DMB to be sound?</b>	<b>YES</b>	<b>X</b>	<b>NO</b>	
<b>Q3. Does the DMB comply with the Duty to Cooperate?</b>	<b>YES</b>	<b>X</b>	<b>NO</b>	
<b>Q4. Why do you believe that the DMB is NOT sound?</b>				
a/ It is not positively prepared				
b/ It is not justified				
c/ It is not effective				
d/ It is not consistent with national policy				
<b>Q5. Which part of the DMB are you commenting on?</b>				
Page Number				
Policy Number				DM5
Paragraph Number				

Table / Figure / Appendix	
Other	
<b>Q6. Why do you feel that this part of the DMB is not legally compliant, sound or does not comply with the Duty to Cooperate?</b>	
N/A	
<b>Q7. What changes do you consider are necessary in order to make the DMB legally compliant, or sound?</b>	
N/A	
<b>Q8. If your representation is seeking a modification, do you wish to participate at the oral examination (i.e. in person at the hearing sessions rather than via written representations)?</b>	
N/A	
<b>Q9. Are there any additional comments you would like to make with regard to the DMB?</b>	
<p>IM Properties agree that appropriate lighting can provide a valuable contribution to making Birmingham a successful, safe and connected place.</p> <p>In particular, IM Properties welcome the consistency of DM5 with paragraph 180(c) of the NPPF, in which external lighting “must seek to avoid or mitigate any potential adverse impacts“ on amenity and public safety.</p> <p>This addresses the concerns raised by IM Properties at the Preferred Options consultation stage.</p>	

<b>3. Declaration</b>	
<p><b>Data Protection</b></p> <p>The personal information that you provide as part of this representation will only be used by Birmingham City Council for the purposes of preparing this DMB document.</p> <p><b>Declaration:</b></p> <p>I understand that any representations submitted will be made public as set out above, and that my personal details will not be passed to any third parties without my prior written consent.</p>	
<b>Name: Samuel Lake</b>	<b>Date: 21/02/2020</b>

Please ensure that you submit this form no later than **17:00hrs** on Friday 21<sup>st</sup> February 2020, with an accompanying Part A form completed.

**Email completed forms to:** [planningstrategy@birmingham.gov.uk](mailto:planningstrategy@birmingham.gov.uk)

**Post to:** Planning Policy, Planning and Development, PO Box 28, Birmingham, B1 1TU.

**Tel:** 0121 303 4323

# Representation Form (Part B)

## Development Management in Birmingham Development Plan Document (DMB)

Publication (Reg. 19) Consultation



(For office use only)

Date Received

Date acknowledged

Ref:

### How to use this Representation Form

Please complete the Part A (Personal Details) form in full.

Then, please complete this Part B form for each representation that you wish to make. It is important that you identify on this Part B form which part of the DMB (e.g. paragraph and / or policy number) on which you are making the representation. Please use a separate form for each representation that you wish to make.

### PART B

#### 1. Confirmation of Name\*

*\* please print your name on each separate representation (the name should match that entered on the Part A form)*

Full Name: **Samuel Lake**

Organisation (if relevant): **Turley**

#### 2. Your Representation

*Important Note: For each question, please mark with an X, ONE of the available options only. Please complete a separate form for EACH of your comments. Please also refer to the accompanying guidance note for an explanation of the terms used.*

Q1. Do you consider the DMB to be legally compliant?	YES	X	NO	
Q2. Do you consider the DMB to be sound?	YES		NO	X
Q3. Does the DMB comply with the Duty to Cooperate?	YES	X	NO	
Q4. Why do you believe that the DMB is NOT sound?				
a/ It is not positively prepared				
b/ It is not justified				
c/ It is not effective				
d/ It is not consistent with national policy				X
Q5. Which part of the DMB are you commenting on?				
Page Number				
Policy Number				DM6

Paragraph Number	
Table / Figure / Appendix	
Other	

**Q6. Why do you feel that this part of the DMB is not legally compliant, sound or does not comply with the Duty to Cooperate?**

IM Properties agree that noise and vibration should be managed appropriately to ensure quality of life and working environments, particularly through the mitigation of any impacts.

IM Properties supports the consistency of DM6 with paragraph 180(a) of the NPPF in that where potential adverse noise and vibration impacts are identified, development proposals should set out how such impacts will be reduced and/or mitigated.

However, our previous representations to the Preferred Options still apply in that it remains unclear how BCC will apply the Planning Guidance Note (as referenced at paragraph 2.52 of the Publication Version) maintained by the Environmental Health Unit as non-statutory guidance to assess and determine planning applications and/or reserved matters. Given the Planning Guidance Note has not been subject to public consultation and does not form part of an adopted development plan or is not contained within an SPD, only limited weight can be attached to this guidance.

**Q7. What changes do you consider are necessary in order to make the DMB legally compliant, or sound?**

Please see our response to Q6.

**Q8. If your representation is seeking a modification, do you wish to participate at the oral examination (i.e. in person at the hearing sessions rather than via written representations)?**

Yes.

**Q9. Are there any additional comments you would like to make with regard to the DMB?**

N/A

**3. Declaration**

**Data Protection**

The personal information that you provide as part of this representation will only be used by Birmingham City Council for the purposes of preparing this DMB document.

**Declaration:**

I understand that any representations submitted will be made public as set out above, and that my personal details will not be passed to any third parties without my prior written consent.

<b>Name: Samuel Lake</b>	<b>Date: 21/02/2020</b>
--------------------------	-------------------------

**Please ensure that you submit this form no later than 17:00hrs on Friday 21<sup>st</sup> February 2020, with an accompanying Part A form completed.**

**Email completed forms to:** [planningstrategy@birmingham.gov.uk](mailto:planningstrategy@birmingham.gov.uk)

**Post to:** Planning Policy, Planning and Development, PO Box 28, Birmingham, B1 1TU.

**Tel:** 0121 303 4323

# Representation Form (Part B)

## Development Management in Birmingham Development Plan Document (DMB)

Publication (Reg. 19) Consultation



(For office use only)

Date Received

Date acknowledged

Ref:

### How to use this Representation Form

Please complete the Part A (Personal Details) form in full.

Then, please complete this Part B form for each representation that you wish to make. It is important that you identify on this Part B form which part of the DMB (e.g. paragraph and / or policy number) on which you are making the representation. Please use a separate form for each representation that you wish to make.

### PART B

#### 1. Confirmation of Name\*

*\* please print your name on each separate representation (the name should match that entered on the Part A form)*

**Full Name: Samuel Lake**

**Organisation (if relevant): Turley**

#### 2. Your Representation

*Important Note: For each question, please mark with an X, ONE of the available options only. Please complete a separate form for EACH of your comments. Please also refer to the accompanying guidance note for an explanation of the terms used.*

<b>Q1. Do you consider the DMB to be legally compliant?</b>	<b>YES</b>	<b>X</b>	<b>NO</b>
---	------------	----------	-----------

<b>Q2. Do you consider the DMB to be sound?</b>	<b>YES</b>	<b>X</b>	<b>NO</b>
---	------------	----------	-----------

<b>Q3. Does the DMB comply with the Duty to Cooperate?</b>	<b>YES</b>	<b>X</b>	<b>NO</b>
--	------------	----------	-----------

*If you have answered yes to both Q1 Q2 and Q3, please proceed to Q9. If you answered no to Q1 or Q3, please proceed to Q5. If you answered NO to Q2, then please go to Q4.*

#### Q4. Why do you believe that the DMB is NOT sound?

a/ It is not positively prepared

b/ It is not justified

c/ It is not effective

d/ It is not consistent with national policy

#### Q5. Which part of the DMB are you commenting on?

Page Number

Policy Number	DM15
Paragraph Number	
Table / Figure / Appendix	
Other	

**Q6. Why do you feel that this part of the DMB is not legally compliant, sound or does not comply with the Duty to Cooperate?**

N/A

**Q7. What changes do you consider are necessary in order to make the DMB legally compliant, or sound?**

*Please note: it would be helpful if you could suggest revised wording for any policy or text, being as precise as possible.*

N/A

**Q8. If your representation is seeking a modification, do you wish to participate at the oral examination (i.e. in person at the hearing sessions rather than via written representations)?**

N/A

**Q9. Are there any additional comments you would like to make with regard to the DMB?**

IM Properties continue to support the flexible and balanced approach adopted in Policy DM15 in preventing excessive car parking provision whilst ensuring low on-site provision does not increase on-street parking problems on the surrounding road network.

However, IM Properties contend that the DMP should set out HGV parking standards, as well as the new Parking SPD which will set out the City's parking strategy and revised car parking standards, and that such parking provision should reflect the operational requirements of future tenants.

The emerging Parking SPD should be cross referenced in the implementation section of DM15.

### 3. Declaration

#### Data Protection

The personal information that you provide as part of this representation will only be used by Birmingham City Council for the purposes of preparing this DMB document.

#### Declaration:

I understand that any representations submitted will be made public as set out above, and that my personal details will not be passed to any third parties without my prior written consent.

<b>Name: Samuel Lake</b>	<b>Date: 21/02/2020</b>
--------------------------	-------------------------

**Please ensure that you submit this form no later than 17:00hrs on Friday 21<sup>st</sup> February 2020, with an accompanying Part A form completed.**

**Email completed forms to:** [planningstrategy@birmingham.gov.uk](mailto:planningstrategy@birmingham.gov.uk)

**Post to:** Planning Policy, Planning and Development, PO Box 28, Birmingham, B1 1TU.

**Tel:** 0121 303 4323