

Emailed to Ian Kemp (Programme Officer)  
idkemp@icloud.com

25 November 2020

Dear Ms Ford,

### **Development Management in Birmingham DPD Examination**

Following the examination hearings into Development Management in Birmingham DPD, you have requested that the City Council set out the following:

- A schedule of main modifications;
- Implications of including the Parking Standards within the Development Management in Birmingham DPD as an appendix;
- The Council's approval process for main modifications; and
- An indicative timetable for progressing the DPD to main modifications.

#### Schedule of main modifications

Please find attached to this letter, a proposed schedule of main modifications (MM). Each MM is associated to the relevant policy and supporting text.

#### The implications of including the Parking Standards within the Development Management in Birmingham DPD as an appendix

There are a number of implications:

1. It increases the weight that the parking standards carry and therefore makes them more rigid, reducing the ability of the Council to take a flexible and pragmatic approach where necessary. Given the size and complexity of a city like Birmingham, this flexibility is important and needed. The Birmingham Development Plan (BDP) already establishes parking standards as being provided in a separate SPD. Paragraph 9.53 states:

*“The City Council recognises that parking is an essential requirement for many developments, but the level of parking will need to be balanced against a desire to encourage sustainable transport patterns and reducing emissions and congestion. The City's Parking SPD provides information on appropriate levels for various land uses. These are set out as maximums and the cycle/motorcycle and disabled car*

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*parking standards are minimums. The City Council will take account of whether there are any circumstances, related either to the site or the operation of the development, which may support an alternative level of parking.”*

The Council therefore considers that the parking standards are more flexible if they are guidance rather than policy. Representors are likely to argue that flexibility should be written into the policy, resulting in the same effect as having the standards in an SPD.

2. Including the parking standards within the DMB and the zonal mapping in an SPD is likely to cause confusion to the reader and make the different elements difficult to understand. If the standards and the zonal map are in two different places this will require the reader to navigate between two documents, which would not be user friendly.
3. Including both the standards and the zonal mapping in the DMB makes it inflexible to change, as accessibility changes. The zonal mapping needs to remain flexible to ensure it provides an accurate reflection of most recent data on public transport accessibility, car ownership levels and local parking control measures.
4. The SPD sets out details on the application of the standards; the standards alone would be less effective without the guidance alongside them. Having standards and the supporting detailed guidance in two different documents would not be user friendly.
5. We would have concerns about the inevitable delay that this would cause to the adoption the DMB, as well as the inflexibility and potential confusion this approach would present to users of the document.

#### The Council's process for consulting on main modifications

The Council's Statement of Community Involvement (SCI) does not specify how main modifications will be consulted on. The Council therefore proposes that it follows the same process as at the Publication Stage, allowing for a minimum 6-week consultation. The Council has a Temporary Covid-19 SCI reflecting Government legislation and regulations to allow for Covid-19 restrictions. The Council's Cabinet and Full City Council will need to give approval to consultation on the main modifications. Cabinet and Full Council meet monthly but the lead in time for reports to Cabinet is 3 months and the two meetings are not aligned in terms of timing. This is reflected in the indicative timetable overleaf.

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Timetable

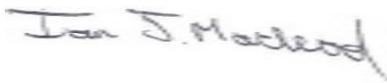
In light of the above, the indicative timetable for progressing the Plan to consultation on main modifications is as follows:

| Stage                           | Date   |
|---------------------------------|--|
| Lead in time for Cabinet Report | 25 November (place on Cabinet Forward Plan). |
| Cabinet meeting                 | 16 March 2021                                |
| Full Council meeting            | 13 April 2021                                |
| Consult on main modifications   | April - June (6 weeks)                       |

I trust this provides useful information. Please do not hesitate to contact [Uyen-Phan.Han@birmingham.gov.uk](mailto:Uyen-Phan.Han@birmingham.gov.uk) should you have any queries are require further clarification on the contents of this letter.

I look forward to your response.

Yours faithfully,



Ian Macleod  
Acting Director, Inclusive Growth  
Birmingham City Council