

Birmingham Development Plan

Consultation Summary

Introduction

The Birmingham Development Plan Pre- submission document has evolved after three consultations.

In 2008, Birmingham City Council consulted on an Issues and Options paper which sought views on three options based on different levels of housing growth. This document was prepared in the context of the then ongoing review of the West Midlands Regional Spatial Strategy. The consultation involved formal letters to statutory bodies, elected members and to groups and bodies such as residents groups and a series of manned public exhibitions at the Bullring, the Sutton Gracechurch Centre, Grosvenor Shopping Centre, Northfield and the Cascades Stechford. A stakeholder event was held at the Burlington Hotel . The draft paper was available and publicised at all libraries and neighbourhood offices within the city and was also publicised by means of on-street advertising. Presentations were undertaken at Constituency Committee Meetings and also on request at Ward Committee Meetings and there was a discussion at the Council's Sustainability Forum . A questionnaire and summary document were produced and circulated in the Birmingham Voice (the City Council newspaper). All the documentation was also available on the Council's website. The consultation ran for six weeks.

Based on the representations received on the Issues and Options consultation a Draft Core Strategy was published for consultation in 2010. This proposed meeting housing need without major green belt allocations. It included promotion of the city centre, the eastern corridor and the three growth centres. The consultation again involved formal letters to statutory bodies etc and to all those who responded to the Issues and Options consultation, and information was again made available in all libraries and neighbourhood offices and on the Council's website. A summary was produced and distributed as an insert in the Birmingham Post and the Evening Mail. Manned exhibitions were held in a range of libraries across the city and there was again a discussion at the Sustainability Forum, at Constituency Committee meetings and Ward Committee meetings on request. The consultation ran for 12 weeks.

The abolition of the Regional Spatial Strategy, the publication of the National Planning Policy Framework and the emergence of higher population and household projections for Birmingham led the Council to undertake a further consultation in late 2012 and early 2013. This considered options for accommodating higher levels of housing and employment growth, including the potential for housing and employment development on land within the green belt to the north and east of Sutton Coldfield. Once again formal letters were sent to statutory bodies etc and to all those who had commented at the previous stages. Again the document was available at all libraries and neighbourhood offices and all the documentation was provided on the Council's website. Manned displays took place on several occasions in Mere Green, Walmley and Boldmere libraries as well as at the Central Library and some libraries in the rest of the city. There were presentations to Constituency

Committees and to Ward Committees on request. Officers also attended other meetings organised locally. The consultation ran for nine weeks.

Issues and Options Consultation 2008

This suggested a Vision and Objectives and put forward three options for growth.

Option 1 – Business as Usual - 50,000 dwellings 2006 – 26

Option 2 – Maximise development within the urban area – 55- 60,000 dwellings 2006 – 26

Option 3 – Urban Extension – up to 65,000 dwellings 2006 -26.

There were 1548 comments from 225 respondents.

The key messages were:

- Support for the Vision but a minority view that it should be based on sustainability principles rather than growth.
- Support for the Objectives – but suggestions that more emphasis should be put on public transport, the arts, biodiversity, older people and the historic environment.
- The majority of respondents were against development in the Green Belt, but some house builders argued that this was the only way that the Regional Spatial Strategy housing targets could be met.
- Support for the continued protection of the City's mature suburbs.
- It was felt that the City's transport system is inadequate and connectivity and accessibility are poor. There was general support for the extension of the Metro but mixed views on the expansion of Birmingham International Airport and a view that provision for cyclists needs to be improved.
- Concern that there is insufficient affordable housing and a lack of housing for particular groups such as the elderly.
- Questions were raised as to why the city is aiming for population growth – it was suggested that the priority should be Birmingham's residents, not wider, global issues.

- It was argued that new development should be sustainable and that the issue of climate change should be addressed.
- Continued development of the city centre was generally supported as was the concept of the Eastern Corridor and the identification of three growth centres.
- The most popular option was a combination of Options 1 and 2. There was little support for Option 3.

In response to this:

- The Vision was adapted to emphasise sustainable growth.
- The Objectives were revised to reflect the comments made.
- Option 2 was selected as the basis for the draft Core Strategy, including promotion of the city centre, the eastern corridor and the three growth centres – but with no major green belt allocations.
- A 'suite' of policies to address climate change was included and the Sustainable Urban Neighbourhoods concept was emphasised
- Policies were included in the draft Core Strategy to protect mature suburbs, and to promote the provision of affordable housing

Draft Core Strategy Consultation 2010/11

General

The Draft Core Strategy contained a Vision and Objectives revised in the light of the Issues and Options consultation and a draft strategy based on option 2. The levels of growth proposed reflected the emerging Regional Spatial Strategy Phase 2 Revision. The document included city-wide policies and then a series of area-based policies/proposals.

There were about 1350 comments from just over 200 respondents. Less than half of these were actually seeking a change to the Strategy. The rest were supporting or making general observations.

The range of comments was large. There were comments on all of the city-wide policies – but the highest number of comments on a single policy was only 33 (on SP1 – Birmingham as a Global City.) There were fewer comments on the Area policies but there were only a small number of policies with no comments at all. The City Centre and the South areas attracted more responses than the East or the North and West.

The comments received, and the Council's response to them, are summarised below, following the main sections of the draft Strategy.

Vision

36 responses were received. None of these objected to the Vision – but there were a number of suggestions for additions (for example in relation to sustainability, the natural environment, health and canals).

The Vision has subsequently been shortened significantly while retaining the key principles – so the detailed comments have not for the most part been incorporated although it is considered that the issues raised have all been reflected in the Plan.

Objectives

There were 109 comments on the Objectives. The majority of these were supportive.

As with the Vision there were suggestions for additions. Some of these were very detailed. A small number of comments questioned the delivery of the Objectives or pointed to inconsistencies between policies and Objectives (for example the expansion of the airport was said to be inconsistent with sustainability)

Some housebuilders questioned the Council's ability to deliver population growth without building in the green belt and there were a small number of comments questioning whether growth should be promoted at all.

The Objectives have been taken forward largely unchanged – but again in a slightly shortened form. Detailed suggestions for additions have therefore for the most part not been incorporated. While it is recognised that there can be tensions between Objectives, it is not considered that there are any significant inconsistencies. Issues to do with growth levels and their delivery are considered in the next section.

Scale of Growth

There was some support for the scale of growth proposed. However several housebuilders argued that the housing requirement should be higher to reflect ONS projections and concluded that this would require a green belt review. They also pointed to a need for the end-date of the plan to be changed to give a plan period of at least 15 years. There were no suggestions for a lower level of housing growth. One comment emphasised the importance of quality rather than quantity.

There were a few comments pointing to the need for employment to match housing growth and one suggested that more housing could be allowed on employment land. One comment questioned the comparison retail figures as too high.

A range of other detailed comments were made.

The 'Birmingham as a Global City' policy received almost universal support – but there were several suggestions for additions to it.

In response to this, national policy changes and more recent evidence, the plan period has been extended to 2031, higher levels of housing and employment are being proposed (but less comparison retail) and a green belt review has been undertaken. The potential for more employment land to be converted to housing has been further investigated, but is not considered to be acceptable in view of the shortage of employment within the city.

The 'Birmingham as a Global City' policy has been retained but renamed and made more focused so detailed comments have not been incorporated.

Sustainable Urban Neighbourhoods (SUNs) and Quality of Life

Only one comment (from St Modwen) opposed the SUN concept, on viability grounds. There was some questioning of how the policy would be delivered and several suggestions for additions. A few comments suggested that the policy should be applied more widely rather than just to specific areas.

The Quality of Life policy attracted a diversity of comments mostly supporting specific aspects or suggesting additions. There were no objections.

Friends of the Earth have suggested that the Strategy should include a definition of sustainable development, based on the principles included in the UK Sustainable Development Strategy and Planning Policy Statement 1 (subsequently withdrawn) in view of the importance attached to this in the Localism Bill.

In response, the Sustainable Neighbourhood policy has been retained but made more generic. Where appropriate, detailed comments have been reflected. The Quality of Life policy has been dropped because it repeated material already set out elsewhere– but the principle is retained within the Vision and the detailed issues are picked up in other policies. A Sustainable Development policy has not been included, since the National Planning Policy Framework (NPPF) already sets out the position on this.

Climate Change

Most comments supported a strong policy approach in relation to this issue – but a few questioned the Council's commitment to a 60% reduction in carbon emissions. Some suggested that policy SP5 (Reducing the City's Carbon Footprint) was unnecessary because it mainly cross-refers to other policies but there were also supporting comments. There was no objection to SP6 (Adapting to Climate Change) – but a lot of detailed comments.

On policy SP7 (Sustainable Construction) the main issue was a concern that the approach is over-ambitious and will impact on the viability of development. A more specific point was raised over whether when we refer to the Code for Sustainable Homes we are referring only to the energy element or the whole code (the Government's mandatory requirements currently relate only to the energy element). However there were also quite a number of comments supporting the proposed approach

A wide range of comments were received on the Low Carbon Energy (policy SP8). Some challenged the threshold, some suggested that the policy should place less emphasis on CHP and be more flexible and others questioned the policy on viability grounds. There was also some support.

There were only a few comments on policy SP9 (Flood Risk), the most significant being from the Environment Agency wanting detailed changes and arguing that surface water run-off rates from new developments should be limited to greenfield levels.

These policies are being taken forward for the most part unchanged in principle, but with detailed changes to reflect comments made.

The Green Commission has restated the 60% carbon reduction target (by 2027), so this is retained.

The Sustainable Construction policy has been revised to provide more flexibility and to reflect the current position with the Code for Sustainable Homes. More flexibility has also been included in the Low Carbon Energy policy including a higher threshold for residential developments, but the preference for the use of CHP is retained. The Flood Risk policy has also been revised in the light of comments received – although it is not considered reasonable to require all brownfield developments to reduce surface water run-off to green field rates, this will be required in the most sensitive locations and a reduction in run-off rates will be required in all cases.

Green Infrastructure

The Green Infrastructure policy (policy SP11) was broadly supported but with a number of suggestions to strengthen it (for example. in relation to trees and water features).

The Environment Agency raised a range of concerns over water quality and the impact of climate change. Some of these concerns were shared by Natural England. Both concluded that further work is needed to address these issues. This work has been carried out through the preparation of a 'Green Infrastructure Strategy', largely funded by Natural England. This was adopted by the Council in September 2013 and is known as the Green Living Spaces Plan.

This policy has been retained, but with revisions to ensure that it reflects the approach put forward in the Green Living Spaces Plan.

Employment

There was support for the Core Employment Area approach (policy SP12) but there were comments on specific proposed Core Employment areas. The Ardath Road site in Stirchley was felt not to be suitable especially as the site had not received any interest/ offers for employment use for at least two years. Similarly the Denso site in Hall Green was not felt to be suitable. One consultee sought information on how Core Employment Areas had been selected. It was suggested that it should be explicit that supermarkets and retail uses are not acceptable within Core Employment Areas.

The Regional Investment Site (RIS) policy (policy SP13) received support. However, some consultees wanted offices to be permitted within RIS and also flexibility to consider other uses where there was no demand. It was suggested that there is a need for a sustainability champion to promote local energy networks, green business investment etc. Sustainable transport accessibility was also highlighted as important and should be a theme throughout document including RIS policy. The Highways Agency noted the need to ensure the Strategic Road Network is not adversely affected by RIS proposals.

The employment land provision figures were broadly supported (policy SP15) – but a number of comments sought a more flexible definition of ‘employment’, in line with national guidance (i.e including retail development) and some consultees felt that other job creating development should be considered also.

Support was expressed for policy SP14 Central Technology Belt ,(CTB) but there were concerns over the limited types of uses encouraged within the CTB. It was commented that the Birmingham Battery site is not suitable for high technology development, and that there is a need for an alternative corridor to Coventry/ Solihull and Warwick. Sustainable development and sustainable accessibility were again identified as important by some respondents.

There was support for the protection of employment land policy (policy SP16). However flexibility was sought in terms of land use and there were a few comments seeking housing development on employment sites and support for the release of some poorer employment land for residential use. There was also a call for town centre uses to be considered on employment sites to stimulate economic growth and for the provision of flexibility to convert outdated offices to other uses.

Some comments sought a more positive reference to manufacturing within the City and suggested that reference to the Enterprise Zone was needed.

These policies are being taken forward with detailed changes to reflect the comments and additional evidence work undertaken since this consultation. The exception is the Central Technology Belt policy which has been dropped because the concept is no longer being pursued and the CTB company no longer exists.

The Core Employment Areas have been reviewed and Ardath Rd and Denso have been dropped. There are no significant changes to the approach to RIS – which is already included in the Longbridge and Aston/Newtown Area Action Plans. Detailed issues in relation to the two sites have already been addressed through those plans.

The employment land requirement figures have been adjusted in the light of more recent evidence. The supply of employment land has also been reviewed, resulting in the identification of a need for additional land to be brought forward. This has led to the identification of a new 80 hectare employment site on land at Peddimore near Minworth, currently within the green belt

No change is proposed to the definition of employment. Stronger references to manufacturing and a reference to the Enterprise Zone in the supporting information have been included.

Centres

Most comments supported the proposed network/hierarchy of centres (policy SP17). A small number suggested it should be expanded to include more local centres

There were several comments on the ‘three centres’ concept;(Policies SP17 and SP18). Walsall MBC and to a lesser extent Sandwell MBC objected to the scale of development proposed for Perry Barr, there were differing views about Selly Oak, and one comment from Tesco suggesting that too much is proposed at the Meadway. Other comments sought retention of at least 80% of the open space at the Meadway, which would effectively reduce the level of development that could be accommodated there.

There was general support for the level of comparison retail growth proposed. (policy SP18), but some concerns from House of Fraser about the scale and direction of future growth in the city centre. A few comments (from retailers) sought a more flexible approach on convenience retailing (policy SP19).

Some comments argued for a stronger approach on hot food takeaways. Some also sought stronger policies to protect independent retailers from national chains (policies SP20 and 21).

The Tourism policy (SP22) was generally supported.

Some detailed changes have been made to the hierarchy of centres but there are no additions. The three centres concept has also been retained – but with some revisions to the levels of development proposed (the Perry Barr position has already been resolved through the Aston/Newtown AAP).

The comparison retail figures have been reduced, reflecting more recent evidence. The ‘gap area’ convenience policy has been replaced by a more generic policy, reflecting the fact that most of the gaps are now filled. Policies relating to diversity in centres and independent retailing have been retained with minor changes in response to comments. The Tourism policy has also been retained – but made more positive.

Housing

Several housebuilders pointed out that Core Strategies are supposed to have a 15 year life after adoption – which would mean an end date of 2028 or later rather than 2026. Many housebuilders also argued for higher housing numbers, in some cases sufficient to accommodate all the projected ONS household growth and in other cases a figure in line with the RSS Panel Report. The Strategy was criticised for not having clear evidence to support the chosen housing figure. A few comments criticised the proposed housing delivery trajectory because it underprovides against projected growth in the early years. There were few comments on the proposed distribution of new housing – but the high level of provision in the city centre was noted.

The same housebuilders also argued for a green belt review and criticised the Strategic Housing Land Availability Assessment (SHLAA) for failing to consider green belt sites. In each case the conclusion was that a particular site should be released from the green belt for housing development. Following this up, there was also criticism of policy SP25, The Location of New Housing, because of its dismissal of green belt locations and the inclusion of a 90% brownfield land target (although this target was also supported by some respondents).

There was also an argument from housebuilders that the proposed density policy (policy SP31) should be relaxed because future demand will be focused on family housing rather than apartments. Housebuilders also criticised the affordable housing policy (policy SP27). The key point raised related to the need for more flexibility to take account of viability issues. There was also criticism of the proposed policy because it proposes differential rates of provision on City Council land. Other points raised include the need for a clearer approach to specialist housing for the elderly. There was also some support for the policy (for example from the Homes and Communities Agency).

Mature Suburbs attracted relatively few comments (policy SP30) – but almost all of these supported the principle that their character should be protected. A few comments criticised the requirement that new development should be designed in line with lifetime homes criteria

Only a few comments were received in relation to gypsies and travellers (policy SP29) and none of these challenged the basic approach. However Walsall felt that the number of pitches required should be set out in the policy. In relation to existing housing (policy SP32) a number of responses argued for a stronger approach to promoting the ‘retrofit’ of existing houses in relation to energy efficiency and sustainable drainage. There was also a comment that more should be done to encourage vacant properties to be re-occupied. Policies in relation to the Type and Size of New Housing (SP26) and Student accommodation (SP28) attracted little adverse comment but several suggestions for detailed change.

In response to these comments, the end date of the Plan has been changed to 2031 and the evidence base in relation to overall housing need and land availability has been reviewed and updated. In the light of this the need for a green belt review has been identified and undertaken, resulting in the proposed allocation of green belt land for housing (the Langley Sustainable Urban Extension).

The housing target and trajectory have been reviewed to reflect the updated evidence base. The trajectory is still ‘backloaded’ reflecting current market conditions and the time that will be needed to bring forward a green belt site. The housing target, even with green belt development is below the identified housing requirement and so the City Council will work with adjoining authorities to address the shortfall.

The policy on housing distribution has been replaced by a new growth area section. It is not considered that there is a case to change the density policy– but the brownfield target has been reduced to 80%.

The affordable housing requirement is supported by an updated Strategic Housing Market Assessment and so is unchanged, but the differential rate on Council-owned land has been dropped. The policy allows for flexibility to respond to viability changes.

The policy on existing housing has been replaced by a Housing Regeneration policy which identifies areas for regeneration. The policy on the Design of New Housing has been dropped – the key principles will be included in a new Quality of Place policy and the detail in the proposed Development Management DPD.

Other policies are substantially unchanged, but with revisions in response to detailed comments where appropriate.

Transport

The overall approach on transport was broadly supported (policy SP33) with comments mostly related to specific issues or improvement schemes. The main issues related to delivery and the evidence base (particularly from Centro and the Highways Agency). The Highways Agency noted the need to include any improvements required to deliver growth. Many comments were locally specific and supported particular initiatives (for example reopening the Camp Hill line to passenger traffic)

There were several comments seeking inclusion of a policy on cycling. There were few comments on the transport corridors (policy SP34), mostly detailed or noting the need to balance development against transport objectives. A few comments sought a stronger approach to reducing carbon emissions from transport (policy SP35) and others raised the possibility of designating a Low Emission Zone. There were also some comments raising detailed issues on this policy.

There was some opposition to the inclusion of accessibility standards (policy SP36) on the grounds that they are arbitrary and could impact on the viability of development. However there was also support for the approach. There were few comments on digital connections (policy SP37) but none objecting.

Some comments drew attention to the abolition of national maximum car parking standards (policy SP38) – but otherwise there was not much comment on the car parking policy. There were very few comments on traffic management. (policy SP39). The potential to improve this through new technology was noted. Comments on Freight (policy SP40) and Pedestrians (policy SP41) were either supportive or detailed.

Further work has been undertaken with the Highways Agency and Centro on transport related matters, A cycling policy has been added. The car parking policy has been dropped, to be included in the Planning Management DPD and the Transport Corridors policy has also been dropped, with the principle retained in the overall strategy. It is not considered that the Development Plan is the right place to consider the designation of a Low Emission Zone. The Accessibility policy is not considered to be too prescriptive and has been retained.

Other policies have been revised as appropriate to reflect detailed comments.

Waste

The waste policies (policies SP42 – 44) were generally supported. However the Environment Agency sought greater clarity on the number and location of new facilities and processes for monitoring and Friends of the Earth sought the closure of the Tyseley incinerator.

These policies have been retained and updated in response to the comments. No change is proposed in relation to the incinerator.

Open space, sport, recreation and other issues

Several consultees supported the policy for open space (policy SP45), especially the threshold approach which specifies minimum requirements within certain distances. There was a call for greater protection of open space. However a few consultees thought that where alternative provision is offered this should be enough to support a proposal involving the loss and that policy should accord with PPG17 (subsequently withdrawn). There were also calls for a more positive approach to development of unused and private open space.

There were a number of comments suggesting a need for more allotments/opportunities for people to grow their own food and also broadening use of open space for micro farms.

Attention was drawn to overlap and linkages with policy SP11 Green Infrastructure and to the possible use of other standards such as 'Woodland Accesibility Standards', 'Accessible Natural Greenspace Standards' and 'Local Nature Reserve provision standards'.

Policy SP46; Sports Facilities was generally supported. However, there were quite a few detailed issues raised by Sport England, relating more to the need for up to date assessments of need, and the need for evidence to justify the loss of playing field land as much as to policy. Sport England also sought a hierarchy of sporting facilities; an 18 month marketing period to establish demand for playing fields; and the need for stronger policy to secure community use of educational sports facilities.

There were very few comments on policy SP47 (Recreational Uses in the Green Belt), all raising detailed issues. The comments on Urban Design (policy SP48) were mainly detailed with several wanting to see sustainability issues made more prominent. The biodiversity (policy SP49), education (policy SP52) and health policies (policy SP51) attracted few comments but were broadly supported, subject to detailed comments. The Archaeology and Historic Environment policy (SP50) attracted some criticism for lacking teeth but was supported by others including English Heritage. It was queried whether there were sufficient, trained staff to operate the policy. A small number of detailed comments were made on the noise and air quality policies

The Recreational Uses in the Green Belt policy has been dropped in the light of the revised approach to the Green Belt, but a new policy dealing with green belt issues generally has been included. The urban design policy has been dropped, with key principles included in a new Quality of Place policy and the detail to be included in the proposed Development Management DPD. The Noise and Air Quality

policies have also been dropped, to be included in the Development Management DPD. The Archaeology and Historic Environment policy has been strengthened

Other policies have been retained with appropriate revisions to reflect comments received.

City Centre

Most of the comments on the City Centre were supportive – but raised issues of detail. There were concerns over the impact of HS2 on Eastside and some comments querying the scale/timing of further retail development and the direction of expansion of the Core Retail Area. The need to support the markets was also highlighted. The potential for future apartment development was questioned.

This section has been removed with the key elements included in a new growth area section. The scale of proposed additional comparison retail development has been reduced. The Strategic Housing Land Availability Assessment has been reviewed

North and West

A number of comments suggested the release of specific sites from the green belt for new housing and suggested that the housing allocation for the area should be higher. Walsall MBC objected to the retail proposals at Perry Barr (policy NW5)

A range of other detailed comments were also made

This section has been removed, with the key elements included in the new growth area section (in relation to Greater Icknield, Aston/Newtown, Sutton Coldfield Town Centre and the Langley Urban Extension.) The scale of retail development at Perry Barr has been agreed through the Aston Newtown Lozells Area Action Plan. It is now proposed to develop some green belt land for housing (the Langley Sustainable Urban Extension)

East

Most of the comments were detailed. One suggested that levels of housing provision in the East should be higher. The highest number of comments was on Acocks Green (policy E4), mainly concerned with the quality of the residential suburbs, the local centre and traffic management. The release of land from the green belt at the former Yardley Sewage Works for housing development attracted only one

objection and one supporting comment. There were a few concerns over the scale of retail development proposed for the Meadway and one comment suggesting more development at Stechford. Sport England objected to the loss of the Wheels site.

This section has been removed, with the key elements included in the new growth area section (in relation to Bordesley Park, Stechford, Meadway and Yardley Sewage Works)

South

Most of the comments were detailed. The proposals for Selly Oak (policy S5) attracted a number of comments, supportive of growth for the most part, but raising a range of specific issues. St Modwen emphasised the need for development at Longbridge to proceed in line with the AAP. There were a handful of objections to the North Worcestershire Golf Course proposal (policy S8)(including one from Sport England) – but 181 standard letters of objection and a petition were handed in subsequently.) Stirchley (policy S10) attracted the greatest number of comments. These supported the need to regenerate the centre. However the majority were against supermarket-led regeneration and preferred an approach based on independent retailers

This section has been removed, with the key elements included in the new growth area section (in relation to Selly Oak and Longbridge). The North Worcestershire Golf Course proposal is no longer being pursued. Planning permission has already been granted for a supermarket at Stirchley

Implementation and Monitoring

There were few comments, either supporting or making detailed points.

The Development Management policy is to be dropped in view of the decision to produce a Development Management DPD.

Implementation and Monitoring policies have been updated as appropriate.

Planning for Birmingham's Growing Population Options Consultation 2012/13

General

There were 1,572 comments primarily from members of the public but also from and on behalf of organisations. These comprised:-

- the Council's official form completed electronically or by hand;
- letters
- leaflets against the development referring to the housing and the employment proposals with space for comments.
- a leaflet against the development referring to just the housing proposals with space for comments.

There was also a petition with 2,626 signatures against green belt development and a Survey of Opinion in relation to housing development at North Worcestershire Golf Course with 273 responses.

Overall response

Although the consultation was citywide and considered a range of options for accommodating higher levels of growth, the vast majority of comments were about green belt issues

The majority of respondents (around 90%) were opposed to the release of green belt land for housing development. Those opposing were for the most part local residents of the Sutton Coldfield area, but there was also opposition from organisations such as the CPRE, Friends of the Earth and the Inland Waterways Association. Those in favour of green belt development were mainly housebuilders and commercial interests, although there was support from a handful of local residents

Only about two thirds of respondents expressed a view on the employment proposals and over 90% of these were against the use of green belt land for employment development. One reason for the lower response rate to this question may be the fact that quite a few respondents completed a locally circulated questionnaire which only referred to housing. It is likely that the majority of these respondents would also have opposed employment.

Arguments against green belt development

Just over 1400 responses were given to the section of the questionnaire which allowed respondents to indicate reasons for objecting to green belt development. The table below summarises the main reasons put forward.

Number of Responses	1,411
Important to keep green belt / open space	928
Local services stretched: transport	848
Plenty of brownfield sites available	737
Local services stretched: education	724
Local services stretched: health	687
Plenty of empty properties around including industrial sites	538
Detrimental effect on residents' quality of life / property values / character of area	447
Re-use vacant industrial units for employment purposes	378
Local services stretched: other	370
Population issues including immigration	279
Impact on wildlife / biodiversity	190
Build in other areas - new town	161
Protect agricultural land	125
Lack of local employment opportunities	57
Higher densities / apartments	44
Unfair to keep targeting Sutton with developments	35
Smaller scale of overall development	22
Impact on archaeology	17
Not a local decision / against localism	3

The main reasons raised as the table above shows, concerned effect on the environment; loss of green belt and concerns over the impact of development on infrastructure and in particular roads, schools and health facilities. Some respondents also questioned the reliability of the population and household projections but no evidence-based alternative figure was suggested.

Respondants were given the opportunity to identify which of the green belt options they considered to be the most suitable for housing and for employment. Less than half expressed a view in relation to housing and almost 80% of these said that none were suitable. D1 was the most favoured site and A2 the least favoured – but in view of the small number of responses, little weight can be placed on this. Even fewer responses were received in relation to employment, with D1 again being the most favoured and A2 the least favoured.

Some responses specifically objected to development in certain locations. Areas A1 and A2 received the most objections (45 and 42 respectively) and D1 the fewest (7) – but again the numbers are small.

Comments from Statutory Bodies and Infrastructure Providers

None of the responses received from statutory bodies suggested that any of the green belt options are unacceptable. The following points were made:

- The Environment Agency noted that there may be a need to upgrade sewer systems, and drew attention to detailed flood risk, water quality, aquifer and green infrastructure issues.
- Severn Trent expressed a preference for sites D1 and C2 as these are closest to existing treatment works at Minworth. Their least favoured options were A1, A2 and B1 as these would require extensive sewer upsizing. They also noted that B1, B2 and C1 would impact on Langley Mill Treatment Works, but that this would provide an opportunity to abandon this and connect to Minworth.
- No response was received from South Staffs Water. However previous responses indicated that there are no water supply issues.

- Western Power highlighted existing infrastructure such as overhead lines and substations which would need to be maintained. They identified no preference in terms of sites, but suggested that there would be a requirement for expansion or reinforcement of the high voltage network to accommodate development in the Green Belt.
- The National Grid identified the presence of an underground line in area A2.
- Natural England supported the general approach. They noted the importance of green infrastructure, wildlife pathways etc and highlighted specific features requiring protection in areas A and B. They also noted that area C includes some grade 3a agricultural land and area D includes substantial grade 3a land.
- English Heritage noted the need for historic assets to be taken into account.
- The Highways Agency concluded that there could be significant impact on the Strategic Road Network requiring mitigation in Birmingham, Warwickshire and Staffordshire. The detail varied between the options. However no specific locations were particularly favoured or disadvantaged.
- Centro supported the general strategy and made no comments specific to the option locations.
- The Health and Safety Executive made no specific comments.
- The Mineral Products Association expressed a preference for either A, C or D over B. B has significant mineral resources, and if developed they would expect provision for these to be extracted before development takes place.

Comments from Landowners, Developers and Housebuilders

A number of landowners and developers made submissions. Some of these were supported by technical studies in relation to access, landscape, archaeology, ecology etc. The following is a summary of the key points:

- There was support for an overall housing requirement within the 80 – 105,000 range. Most advocated a figure at the top end of this range.

- Almost all argued for lower densities, in the range of 30 -35 dwellings per hectare rather than 40.
- Most accepted that there is a limit on the number of dwellings that the market would in practice deliver within the option areas , but there were different views on what this is. The most detailed analysis concluded that it could be 9,360 to 11,700, with a possibility of reaching 15,600. There was also a view that areas B and C would serve different markets so it would be possible for development to proceed on both at the same time. This would be necessary in order to achieve the higher development rates suggested
- Submissions were made promoting housing development across the majority of areas B and C, but for only parts of Area A (mainly A1). There was some criticism of Area A as a potential development site because of the high visibility of parts of it, the presence of the masts and its deliverability because of fragmented ownerships. Most of the B and C interests supported employment development on Area D.
- Ashford Estates who have land interests in North Warwickshire suggested the construction of a new link road from the A38 to junction 9 of the M42, which would enable the identification of a larger employment area extending from area D through land to the north of Curdworth to the motorway.

Comments from adjoining Councils

Most adjoining Councils responded. Their comments are summarised below:

- Solihull MBC were concerned over the implication of Birmingham not meeting its housing requirement inside the city boundary and considered that wider issues should be addressed through the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP)'s Spatial Framework.
- Staffordshire CC were concerned about the potential impact of proposals in terms of effects beyond Birmingham's boundary; especially on roads and the housing market and the need for mitigation.
- Tamworth BC wanted more information on other green belt sites within Birmingham (sites E, G, I, J, K,L,M, and N.) Whilst they supported green belt release they were concerned over the potential impact on infrastructure and the scale of development.

- Lichfield DC queried the discounting of small green belt sites and raised concerns over the sustainability of the option sites. They also highlighted infrastructure problems and the large scale of the proposals. They felt that reusing existing employment land should be considered instead of green belt employment land release.
- North Warwickshire DC supported Birmingham in accommodating as much of its housing requirement as possible within the city boundary and noted that North Warwickshire had not previously been identified as a location for Birmingham overspill
- Bromsgrove DC were concerned over Birmingham's housing requirement being met in part beyond the Birmingham boundary and felt that small green belt sites should be considered more fully.
- Coventry CC felt that Birmingham's housing need is far too high and undeliverable and has implications for neighbouring authorities and the green belt. They therefore cannot support the strategy.
- Walsall MBC and Association of Black Country Authorities (ABCA) note that there is capacity for 3,100 dwellings over identified need in Black Country which could help with Birmingham's requirement. They do not think that any greenfield land should be released till 2026 and only when it can be demonstrated that no brownfield land is available. Industrial development in the green belt should only be for a single user with a 20 or more hectare requirement. They also thought that additional town centre uses should be in scale with hierarchy of centres.
- Malvern Hills DC supported the vision and Birmingham's approach to meeting needs through local jobs and services and thriving local centres. They also supported Birmingham's commitment to make provision for additional population and emphasised that the Council should maximise housing in the City to meet its own needs. Birmingham's role in connectivity was also emphasised.
- Hints and Canwell Parish Council raised the need for more health, education and public transport resources to reflect additional demand and supported brownfield reuse and protection for wildlife and conservation areas.

Other Comments

There were only a small number of comments on issues other than the green belt

Four sites were promoted for possible housing development in other parts of the city - West Hills Golf Course, North Worcestershire Golf Course and two sites in Balsall Heath. However there was also opposition to development at North Worcestershire Golf Course from local residents and Councillors.

An industrial site at Warstock Road, Kings Heath was promoted for convenience retail development.

Tesco supported the City Council's desire to meet the needs of its growing population. They wanted the plan to be more explicit in terms of provision of convenience retail development to meet this additional need and they wanted the plan to ensure that new and expanded communities have easy access to convenience retail shopping via sustainable transport modes. Sufficient shops, services and local facilities need to be mentioned when referring to a significant increase in City's population.

Sainsburys also sought policy clarity. They supported the reuse of industrial land for other forms of economic development and wanted long term protection of employment sites avoided in line with the NPPF. They expressed support for the redevelopment of marginal or poor quality land.

City Council Response

Following the consultation, a further review of the Strategic Housing Land Availability Assessment has been undertaken. This has revealed slightly higher capacity on sites within the urban area, but capacity remains well below the identified housing requirement. Responses from adjoining authorities indicate that apart from around 3,000 dwellings in the Black Country, there is no identified capacity to help meet Birmingham's needs in adjoining areas.

Further work has also been undertaken in relation to employment land. Again this confirms that there is an increasing shortfall in provision on recycled sites within the urban area.

In view of this it has been concluded that there further consideration should be given to the option of green belt development. A range of additional research has been undertaken to take this forward and to address issues raised in the consultation response. This comprises:

- A Study of Housing Delivery in the Green Belt Option Areas
- A Landscape Study
- A Transport and Accessibility Study
- An Archaeological Assessment

- An Ecological Assessment

Further work has also been undertaken in relation to infrastructure requirements.

The outcome of this work has been drawn together in an Green Belt Options Assessment. This recommends that Option area C should be developed as a Sustainable Urban Extension and part of Option area D as an employment site, and these recommendations are being taken forward. This assessment included a re-assessment of green belt areas in the rest of Birmingham as well as those to the north and east of Sutton Coldfield

North Worcestershire Golf Course is no longer proposed for housing, since the Club no longer wishes to relocate.

Wast Hills Golf Course has been assessed and is not considered suitable for housing development.

The Birmingham Development Plan is not the appropriate mechanism for resolving issues at Warstock Rd and Balsall Heath which are not sites of strategic significance

The issues raised by Tesco and Sainsbury have been noted – but the Council does not accept that it is inappropriate to seek to maintain core employment areas in employment use.