

Ms Alice Jones
Birmingham City Council
Lancaster House
Lancaster Circus Queensway
BIRMINGHAM
B4 7DJ

Our ref: UT/2006/000217/OR-
09/PO1-L02
Your ref:
Date: 11 February 2021

Dear Ms Jones

3BS (BEECHES, BOOTHS AND BARR) NEIGHBOURHOOD PLAN 2020-2031

SUBMISSION VERSION

I write further to our response of 05 February 2021 reference UT/2006/000217/OR-09/PO1-L01 with additional comments. We request that these are read in conjunction with our previous advice relating to this plan.

We recommend that the following amendments and additions are made to the policy wording to fully encompass water ecology and habitats:

NPP 2 Sustainable Development:

Rewording of 1) a) to read *'Proposals are required to demonstrate they will; improve biodiversity (by promoting the planting of trees, **shrubs, and natural flora**)'*

Addition of 1) l) to read: *'l) protect and enhance the natural ecological & geomorphological function of watercourses'*

NPP 3 Improving the Parks

Addition of 2) d) *'look to facilitate the natural processes of the River Tame'*

Addition of 3) e) *'naturalise the Perry Brook to restore natural functions, improve biodiversity and slow flows'*

Addition of 4) f) *'look for multi-functional solutions to improve, water attenuations, water quality, biodiversity and public amenity value'*

NPP 5 Improving blue and green connections

Environment Agency
9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..

Addition of 1) g) *'incorporating a buffer zone free from proposed development & hardstanding next to watercourses which can be naturalised to provide space for water, biodiversity and natural geomorphological processes.'*

NPP 7 Improving Biodiversity

Rewording of 2) a) as we suggest avoiding the term 'meadows' as this implies a high expectation which can only be achieved through very specific establishment and maintenance requirements. This is fine if the resource is available but can lead to disappointment where not. Biodiversity gains can often be achieved via less onerous inputs, for example reducing grass cutting. We therefore recommend this is reworded to read:

*'strengthening **and planting new** hedgerows and planting **or allowing wild flowers to establish allowing natural ruderal vegetation or shrubs to develop in strips** to provide more robust habitat 'corridors' in and between Perry Hall Park, Perry Park, Turnberry Park and Kingsdown Park; and'*

Rewording of 2) b) 3) and 4) as areas of taller ruderal vegetation and scrub are very beneficial for invertebrate and bird biodiversity and have the added benefit of increasing the permeability of the soil. This can be a much more cost effective solution to tree planting in places where the maintenance of trees may be onerous. It should therefore read:

*2) b) planting of trees, **scrub** and other **natural** vegetation*

*3) The planting of tree **and scrub** species that have been shown to support improvements in local air quality should be included in major development proposals.*

*4) Where appropriate, landscaping schemes submitted to support major planning applications in the 3Bs Area should include landscape schemes that increase the extent of woodland **and scrub** cover and result in the planting of flora to enhance biodiversity in the 3Bs Area.*

NPP 9 Regeneration of Tower Hill Shopping Area

Addition of 1) 6) *Regeneration that looks to enhance and treat the River Tame as a valuable aesthetic asset and improve community connectivity to the river will be supported*

If you have any queries regarding the above please do not hesitate to contact me.

Yours sincerely

Ms Jane Field
Planning Specialist

Direct dial 020 3025 3006

Direct fax

Direct e-mail jane.field@environment-agency.gov.uk

Cont/d..

2

End

3