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c/o Ian Kemp – Programme Officer  
Birmingham Development Plan  
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**Our ref:** UT/2006/000217/CS-  
05/EW1-L02

**Your ref:**

**Date:** 08 October 2014

Dear Sir

## **BIRMINGHAM DEVELOPMENT PLAN – EXAMINATION**

### **HEARING STATEMENT**

#### **MATTER G: SPATIAL DELIVERY OF GROWTH (BDP POLICIES GA1-GA4 & GA7-GA10)**

Please find below the Environment Agency's responses to the questions raised for discussion by the Inspector in relation to Matter G.

*Question 12) Should there be a specific reference in the policy to Plants Brook? (Sutton Coldfield Town Centre GA4)*

Although a number of watercourses were omitted from plans within the Pre-submission Draft of the BDP, this has been rectified as part of the Submission Modifications (SUB2). It is questioned however whether the Plants Brook has been overlooked in this process as it is still not shown on Plan 7 as part of this policy. We consider it essential that watercourses are marked on these maps as they form a key element of green infrastructure, and are integral to the layout and design of development within its vicinity. We acknowledge the requirements of Policy TP6 with regards to management of watercourses within redevelopments, however consider it would improve the plan's effectiveness in highlighting where watercourses are present and where there is specific requirements present with regards to that.

In order to ensure all watercourses are marked on the plans where appropriate we provide the following overview of the changes we consider necessary to reflect the presence of key water features:

- Plants Brook to be added to Plan 7 – Policy GA4 (not Plan 8 as referenced in the councils' summary of comments and responses (SUB9) ID bp2539)
- Langley Brook to be added to Plan 8 (not Plan 9 as proposed within the SUB9 document ID bp2540 and MOD50) – Policy GA5
- Peddimore Brook to be added to Plan 9 – Policy GA6
- River Rea to be added to Plan 10 (not Plan 14 as proposed within MOD53)- Policy GA7
- Bourn Brook to be added to Plan 12 (omitted from proposals within MOD57) – Policy GA9

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*Question 15) Should the policy give greater recognition to the need for improvements to the River Rea and to the East Birmingham Transit Route? (Bordesley park GA7)*

We consider as a key blue corridor running through the city, the River Rea should be highlighted within this policy, along with opportunities it provides for strategic flood risk reduction and habitat enhancements. The stretch of the river running through this area is classified under the Water Framework Directive as of Bad Ecological Potential with the longterm objective of achieving Good Ecological Potential by 2027. Specific actions that redevelopment can provide within this locality include creating variation in the shape of the channel and preserving (or enhancing where possible) the habitat on the river banks and riparian zone.

We acknowledge that this is considered to some level within the Bordesley Area Action Plan (document G4), however consider the BDP should reflect the high level aspirations for this area with regards to the natural water environment, particularly with regards to the fact that that this AAP is not yet adopted.

We suggest that the following wording (or similar) is added to this policy to ensure a high-level steer is provided by GA7:

- *Improvements to the River Rea in terms of flood risk reduction and habitat improvements.*

If you have any queries please contact me on the details below.

Yours faithfully

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