



## BIRMINGHAM PLAN 2031

### Statement by West Midlands CPRE

#### ***Matter M: The natural and historic environment (BDP policies TP7-9 & TP11-12)***

*Main issue: Does the Plan contain effective policies to protect and manage the natural and historic environment?*

Questions:

*10) a) Is the approach of policy TP12 towards the protection of the historic environment consistent with national policy?*

1. West Midlands CPRE generally welcomes support for the historic environment, the emphasis of social infrastructure, the promotion of parks, canals, biodiversity and geodiversity.
2. We are, however, concerned over the scanty reference to Conservation Areas.
3. The plan should clearly articulate the City Council's ambition to maintain and, where possible, enhance its Conservation Areas. As written, Policy TP12 does not stress the importance of the city's Conservation Areas. Nor does it list the Conservation Areas, although there are a number of very important ones. It should be clear in TP12 that the council will refuse permission for development in any Conservation Area which would not preserve or enhance it (the established test).
4. The Development Plan Policies Map does show Conservation Area boundaries, but these are not always clear, because the notation used does not in some locations show their extent clearly. This is particularly the case in the city centre.
5. Policy TP12 should list in a side box the current Conservation Areas by their official names. These should be shown on a more detailed scale on A4-size maps at the end of the Plan. This would allow ready reference to the detail and allow any prospective developer to establish without delay whether a site lies within a Conservation Area.
6. Some Conservation Areas have suffered deterioration in character and appearance due to inadequate control on alterations to buildings. Most notable perhaps was the announcement in 2009 that the City Council could no longer fully protect the Ideal Village Conservation Area in Bordesley Green which had an article 4.2 protection because of the extent of breaches of conditions there.
7. We believe it is essential that Birmingham strongly reiterates its commitment to Conservation Areas and so we would also like to see a commitment to pursuing

new conservation areas and extensions to conservation areas as long as they are consistent with the stipulations in the NPPF (Para 127).

*11) How would a prospective developer know from the Plan whether or not their development proposal would affect a non-designated heritage asset?*

8. Non-designated heritage assets will principally be buildings of historic or architectural interest on a local list - that is, not statutorily listed but given a local listing by the City Council. Although those lists include many locally important heritage assets it would not be practicable to include all of them in a Local Plan. A sentence should be added to state that a Local List is held by the City Council and that the Council will take account of the heritage value of local list assets when considering planning proposals. (In practice the list should be accessible on the City Council website, as should a list of the statutorily listed buildings in the city.)

*12) Are these policies effectively drafted to achieve their intended purpose and do they provide a clear indication of how a decision-maker should react to a development proposal?*

9. At present, no. See above for the steps that should be taken to ensure that Conservation Areas do achieve their intended purpose in the future.