

Birmingham Local Plan - Representations and responses to the Issues and Options Consultation

Question 1 - Do you agree with the challenges and opportunities identified?

| ID | Full Name | Company / Organisation | Created On | Summary | BCC Officer Response |
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| BLPIO-14 | Janelle Kolas | | 04/11/22 09:36 | <ol style="list-style-type: none"> 1. Prioritise brownfield land and ban building upon green spaces. 2. Need more social housing rather than private housing 3. Fly tipping is a huge problem especially in many of the city's green spaces 4. Need for more playgrounds in closer vicinity to communities. Is there a potential to open school playgrounds on weekends? | <ol style="list-style-type: none"> 1. The Local Plan will continue to promote brownfield regeneration. The new policy on open space will afford greater protection to public open space and increase the standards of public open space provision. 2. The Housing and Economic Development Needs Assessment (April 2022) demonstrates a need for both market and affordable housing in the city. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. 3. Fly tipping is not within the remit of planning. Comment will be relayed to the Environmental Health and Street Scene. 4. The new proposed policy for open space will set out new quantity and |

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| | | | | | access standards for open space provision including children and youth play space. |
| BLPIO-39 | Mr Stuart Morgans | Sport England | 18/11/22 09:05 | Recommend the recognition of interlinkages between liveable neighbourhoods, living more active lifestyles and creating a more healthier resilient city. | Supported noted. The linkages between liveable neighbourhoods, living more active lifestyles and creating a more healthier resilient city will be recognised in the Plan. |
| BLPIO-53 | Mr Alex Jones | Gladman Retirement Living ltd | 23/11/22 10:36 | The challenges and opportunities section does not appear to reference the word elderly, older or ageing once which is surprising bearing in mind the acknowledged issue facing the Council. The ‘delivering quality homes and places’ element should specifically reference Birmingham’s ageing population and the need to provide appropriate specialist housing during the plan period (as is identified in the 2022 HEDNA). | The Challenges and Opportunities section provides a high level overview. It is acknowledged that there is a need to provide more homes and different types and sizes and homes to meet the city's housing needs. This will include homes of older people. The plan objectives captures the need to provide for the range of house sizes, types and tenures to meet the city’s housing needs. |
| BLPIO-118 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and | 04/12/22 20:47 | Concerned about the references that relate to Birmingham Wheels Park: 1. It is currently ‘unused’ only because the City Council chose to evict the users from the site at the end of October 2021. There is a continuing need for the facility to be reopened. | The comments and concerns are noted and will be fully considered through the development of the relevant growth zone policy up to Publication (Regulation 19) stage of the Plan Review to reflect the latest position with the site. |

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| | | businesses formerly operating at the site | | <ol style="list-style-type: none"> 2. EITHER consolidation of the sport and recreation activities on the site OR the provision of alternative facilities of least equivalent quality elsewhere. 3. We are concerned that the Local Plan Review is not intended to replace the Bordesley Area Action Plan. This is because the AAP will be out-of-date (i.e. more than 5 years post adoption) by the time the Local Plan Review is adopted. 4. The City Council has been taking action to close and redevelop the sports facilities without protection and replacement which is directly contrary to national policy 5. The identification of Bordesley Park is unclear. Does this mean Birmingham Wheels Park or does it mean the AAP area? 6. Need to ensure there is a full offer of culture, sport and leisure reflecting the interests of everyone. 7. To conclude, the reference to Bordesley Park is disingenuous as it does not reflect the requirement in | |
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| | | | | the adopted BDP to protect the sports and recreation facilities at Birmingham Wheels Park | |
| BLPIO-130 | Mr David Carter | Tyler Parkes | 05/12/22 09:06 | <ol style="list-style-type: none"> 1. The challenge should not just focus just on delivering quality homes but rather affordable, accessible quality homes for <u>all</u> the city's residents regardless of their position in the life cycle. 2. Recognition of the fragility and dynamism of the economy and the need to look deeper into the functioning of business. 3. An increasing population also places increased pressure on existing infrastructure and facilities of all types and this should also be recognised. | <ol style="list-style-type: none"> 1. The challenges already include the need to deliver quality homes, including affordable homes and homes which meet different needs. 2. The challenges recognise the need to plan for the growth and jobs within a changing economy. 3. The challenges recognise the need for different types of infrastructure both natural and built to support growth and move towards a zero carbon climate resilient city. |
| BLPIO-146 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:43 | <ol style="list-style-type: none"> 1. Challenge should be reworded to read 'Protecting, Conserving and Enhancing/Restoring, therefore moving forward in line with the expectations of the Local Nature Recovery Strategies and Birmingham's City of Nature Plan 2. Heritage and Environment are very different therefore, we feel that | <ol style="list-style-type: none"> 1. Agree, wording will be added in reference to 'enhancement' of the natural and built environment. 2. Agree, the environmental challenges will be expanded upon. 3. Agree, wording will be added in reference to the natural environment |

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| | | | | <p>these should be separated and expanded upon independently</p> <ol style="list-style-type: none"> 3. Green Future wording should directly reference the natural environment. 4. Further clarity on how the plan will define Brownfield sites is sought 5. Ensuring Fair Access to open Space, to all Birmingham residents, should be listed among these opportunities | <p>in the section 'Global Leader in a Green Future'.</p> <ol style="list-style-type: none"> 4. The Plan will include a glossary to define 'brownfield' land. This will be based on the definition in the National Planning Policy Framework. 5. Access to open space is addressed through the opportunity section entitled 'Place quality and thriving neighbourhoods'. |
| BLPIO-250 | | West Midlands Housing Association Planning Consortium (WMHAPC) | 13/12/22 13:57 | Important to reiterate the place and role of affordable housing delivery in contributing to Birmingham's sustainable development and growth. | Comment noted. |
| BLPIO-302 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:11 | The Walmley Golf Club's site will be able to make a small contribution to the housing land available which would also assist with the delivery jobs(through the construction, and potentially within any resultant care type residential use). It would allow the provision of new residential development immediately adjacent to existing residential development and would be served by existing infrastructure. | Comment noted. The Walmley Golf Club site falls within the Green Belt. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |

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| BLPIO-418 | Jane Field | Environment Agency | 29/12/22 15:21 | <p>Reducing flood risk is a key challenge for an urbanised city like Birmingham.</p> <p>The Environment Agency are developing a Flood Management Scheme "The Bourn & Lower Rea FRMS" to help reduce the risk to businesses and residential properties in this part of the city and provide multiple benefits. .</p> | Comments noted. |
| BLPIO-471 | | Midlands Land Portfolio Ltd | 30/12/22 14:53 | <p>Agree in particular with the challenge 'delivering quality homes and places' given the very high housing need figure and the limited capacity within the city to accommodate development.</p> | Comment noted. |
| BLPIO-499 | | St. Philips Land | 03/01/23 14:55 | <ol style="list-style-type: none"> 1. Agree with key challenges presented. 2. A suitable strategy must be devised to provide the right quantity of housing in the Council's boundary before relying on other local authorities. 3. Recommend close working with other authorities in the GBBCHMA and beyond to achieve cross-boundary growth of a suitable and sustainable scale applying the Lichfields' 'The Black Country's | <p>Birmingham City Council will continue to work with other local authorities and bodies in the wider area to deal with issues that run across local authority boundaries. We recognise that this joint working is critical for Birmingham as we are unlikely to be able to meet all of our development needs within our boundary.</p> |

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| | | | | next top model' in negotiating the distribution of the unmet need. | |
| BLPIO-22 | Mr Joshua James | Severn Trent Water | 09/11/22 12:22 | Severn Trent is aligned with the City Council's aim to build climate resilient future. Adapting and becoming resilient to climate change is one of Severn Trent's key drivers in the upcoming Drainage and Wastewater Management plan (DWMP). | Support noted. |
| BLPIO-83 | Mr John Pearce | Bloor Homes | 01/12/22 12:11 | Bloor Homes have a number of interests both in the City and the surrounding local authority areas and are promoting sites for development in these locations through emerging development plan reviews. We generally agree that the Challenges and Opportunities identified are sufficient particularly the delivering of quality homes and places objective. | Comment noted. |
| BLPIO-105 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 10:50 | | |
| BLPIO-129 | Ms Mary Keelan | Hinstock Philip Victor Residents Assoc | 05/12/22 07:50 | 1. The spread of EA/HMO properties is not being properly managed and the current provision outstrips what is actually needed. Certain wards are suffering from large numbers of | 1. The Council recognises that high concentrations of HMOs can be harmful to residential amenity and balanced communities and is committed to maintaining and creating thriving sustainable |

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| | | | | <p>poorly managed HMOs and police data on crime supports this.</p> <ol style="list-style-type: none"> 2. The rise in HMOs is also leading to a reduction in the supply of 3/4 bedroom housing in wards such as Handsworth and Handsworth Wood 3. Planning across the city is not being addressed in the plan. Eg Excess of setting up of Children's Homes | <p>neighbourhoods. With this in mind, the City Council introduced a city-wide Article 4 Direction in June 2020 which means planning permission is required to change from a dwellinghouse to a small HMO for between 3 and 6 people (Use Class C4). It also introduced a stronger local planning policy on HMOs (DM11 of the Development Management in Birmingham Development Plan Document) in December 2021 and a detailed Supplementary Planning Document on HMOs in April 2022. With these three tools in place, the Council will be able to better manage the growth of HMOs across the city. Policy DM11 seeks to prevent future localised concentrations of HMOs from developing across the city by ensuring that no more than 10% of residential properties in an area will be in a HMO use, that family houses do not become sandwiched between two HMOs or similar non-family houses, and that there will not be 3 or more HMOs or similar properties in a row in a street frontage. The policy also seeks to ensure that new HMOs do not result</p> |
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| | | | | | <p>in wider negative impacts for the local area and that they provide a good standard of accommodation for the future occupants.</p> <p>2. The Issues and Options Document para 4.40 acknowledged that the loss of family housing is frequent concern raised by residents through planning applications involving the conversion of family houses to Houses in Multiple Occupation (HMO) or specialist housing. This can be problematic as the city has a relatively high level of families and this is expected to grow. The Council is considering introducing a specific policy which policy to prevent the loss of family housing (Use Class C3) would help to retain economically active families in the city and ensure the housing needs of families can be met, sustaining mixed and balanced communities.</p> <p>3. As above.</p> |
| BLPIO-153 | Mrs Fiona Adams | The Moseley Society | 05/12/22 11:05 | We think the sentence in 2.3 should read 're-opening of the Camp Hill Line' but we would like the ambition to build the chords at Camp Hill to be included in the | Agree, it should read 're-opening of the Camp Hill Line' and the Council will maintain support for building of the Camphill Chords. |

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| | | | | Birmingham Plan. We hope that funds will be found to build chords to divert the line into Moor Street and thus enable a more frequent service. | |
| BLPIO-289 | | Henley Investment Management Ltd | 14/12/22 11:08 | <p>BCC's aim to be net zero is ambitious but necessary. The target needs to be clear and the process of assessment of net zero carbon needs to be clear in the plan.</p> <p>Highlights the four different targets within the plan around net zero generally and new development and requests that these are clarified.</p> <p>Discussion should be about what is deliverable. A sliding scale may be appropriate. How embodied carbon will be considered and assessed needs to be clear.</p> <p>Relationship with OFCP - the Local Plan should not be predetermined by OFCP, it should be open to a proper examination process including sustainability and viability requirements. Appropriate engagement with landowners and the public is required.</p> | <p>Comments are noted and support is welcomed. The City Council has a target to be net zero across the City by 2030 or as soon thereafter as a just transition allows. The Local Plan is seeking to set out a policy requirement that all new development is net zero carbon by 20230.</p> <p>A piece of work has been commissioned to test the feasibility of the policies proposed and to look at how net zero is defined within the Local Plan, the feasibility of introducing a carbon off setting fund and how embodied carbon should be considered. This commission will consider viability and additionally, a whole plan viability assessment will be undertaken. Sustainability Appraisal is an on going and iterative process and is informing the preparation of the Local Plan.</p> <p>Whilst the OFCP is an important part of setting the vision for the City, the Local Plan will undergo its own consultation and will be subject to Sustainability Appraisal and</p> |

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| | | | | | viability testing as well as an Examination in Public. |
| BLPIO-313 | | Langley Sutton Coldfield Consortium | 14/12/22 15:38 | <ol style="list-style-type: none"> 1. Need to ensure environmental aspirations for new developments and targets for net zero are financially viable and deliverable. Robust evidence base including viability assessment should be undertaken. 2. The suitability of sites to deliver such proposed policy enhancements and the stage of development of sites which are already under construction will also need to be taken into account to avoid impacting on the delivery of housing. | <ol style="list-style-type: none"> 1. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. 2. Site suitability will be assessed through the Housing and Land Availability Assessment. The Whole Plan Viability Assessment will test the viability of a range of sites. Transition arrangements will be considered to take into account development sites at different stages of planning and development. |
| BLPIO-422 | Jon Morris | Acocks Green Focus Group | 29/12/22 15:29 | <ol style="list-style-type: none"> 1. Deprivation is a bigger challenge than is reflected. To achieve the objectives will require a radically different approach but there is little sign of this in this document. 2. Dealing with the climate emergency requires a radical different approach. Lessons should be taken from good practice - example | <ol style="list-style-type: none"> 1. The Plan acknowledges the economic challenges facing the city and the need to support the growth of an inclusive economy which requires an holistic approach. 2. Tyseley Energy Enterprise Park (Centre of Excellence for Decarbonisation of Heat) is proposed as an opportunity area building on its |

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| | | | | of Tyseley Energy Park which does not even get a mention. | potential to accommodate new waste and sustainable energy technologies. |
| BLPIO-454 | Ben Simm | National Highways | 30/12/22 12:38 | Yes | Support noted. |
| BLPIO-478 | Ms Anna Hulme | St. Modwen Properties Plc | 03/01/23 09:23 | Agree with the challenge of 'delivering quality homes and places', given the identified shortfall between housing needs and the capacity of the city. | Support noted. |
| BLPIO-482 | | MKF Investments | 03/01/23 11:24 | Generally support the challenges and opportunities identified. | Support noted. |
| BLPIO-494 | Craig Rowbottom | Arup | 03/01/23 14:19 | <ol style="list-style-type: none"> 1. The vision and objectives reflect common aims and ambitions 2. Important to set out that the Birmingham has one of the youngest populations in the UK 3. A timescale of a year from Issues and Options to Preferred Options, and then another year to get to Publication stage, is considered a relatively long time. Not clear on the need for two separate Regulation 18 stages. | <ol style="list-style-type: none"> 1. Comment noted. 2. It is already noted within the document that Birmingham has a young population and is the economic heart of the region. 3. The timescale could potentially be shortened between Preferred Options and Publication. The Council considers that two stages of Regulation 18 would be beneficial to build 'buy-in' and allow policies to be developed through engagement with the community and other stakeholders. |

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| | | | | 4. Would be useful for the Council to seek project management support from the Planning Advisory Service | 4. Comment noted. |
| BLPIO-518 | | Druids Heath Consortium | 04/01/23 11:09 | Generally agree but consider that that identifying the housing shortfall as a significant challenge is underplaying the issue. It should instead be identified as an impossibility within the city and that neighbouring authorities will need to accommodate as much of the shortfall as possible. | The Council recognises the need for Birmingham to work co-operatively with other local authorities and bodies in the wider area to deal with issues that run across local authority boundaries. This joint working is critical for Birmingham as, stated in the Issues and Options Document, we are unlikely to be able to meet all of our development needs within our boundary. At the same time, we have to consider any unmet development needs from our neighbours. Birmingham will need to continue to work effectively with neighbours to achieve a planned response to the issues, particularly in relation to housing shortfalls. |
| BLPIO-55 | Ms Libby Harris | Birmingham Friends of the Earth | 23/11/22 16:51 | <ol style="list-style-type: none"> 1. We welcome the section on climate change in the document. However, it should be viewed as an opportunity and not a challenge. 2. Reducing carbon emissions to prevent greater climate change must be an overriding theme that guides all aspects of the Plan. | <ol style="list-style-type: none"> 1. As well as the challenges, the document recognises the opportunities presented by climate change. For example, within the section entitled 'Global leader in a green future' and within the vision and objectives of the Plan. 2. Tackling climate change is a key theme of the Plan and captured |

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| | | | | <ol style="list-style-type: none"> 3. Support the prioritisation of brownfield sites in the city for development 4. Building upwards, instead of sideways, to increase density has some environmental advantages but not if it is taken to extremes. 5. Sceptical about any concentration on heat network zones. Heat networks could be a diversion of resource. The approach must not lock the city into burning waste which would contradict both the waste hierarchy and CO2 emissions reduction. | <p>within the overall vision and objectives.</p> <ol style="list-style-type: none"> 3. Support noted. 4. Agree that densities need to be consistent with creating good living environments. 5. The Government are currently undertaking a lot of work on heat network zones, these networks would need to be based on low carbon energy sources. If heat network zones are mandated BCC would need to implement this national requirement. |
| BLPIO-63 | <p>Mr Andrew Lightstone</p> | <p>DP9 Ltd</p> | <p>25/11/22 17:52</p> | <ol style="list-style-type: none"> 1. Welcome inclusion of Smithfield but it should be noted the Smithfield Masterplan extends further that the wholesale market site - a total of 17 hectares and not the 14 hectares mentioned. The additional land is considered vital. 2. The Smithfield scheme will deliver substantial transport improvements and more than 3,000 homes rather than a target of 3,000 homes noted in the document. | <p>Comments noted.</p> |

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| BLPIO-104 | Mr Antony Whitehead | Our Town | 03/12/22 08:57 | <ol style="list-style-type: none"> 1. Proposals for Langley currently subject to an Outline Planning Application are at present looking promising - though a key test will be the design and integration of the housing packages. 2. Creating sustainable communities is not about preparing attractive plans, rather creating strong community foundations. 3. Understand that establishing community led projects is time-consuming and difficult. Yet it achieves very good results. 4. BCC is acting as a powerful enabler. | Comments noted. |
| BLPIO-108 | Dr Mike Hodder | Council For British Archaeology , West Midlands | 04/12/22 11:00 | <ol style="list-style-type: none"> 1. There should be a bullet point for the historic environment because it is a finite and non-renewable resource 2. Through the Plan, it needs to be stated that the term "heritage asset" refers to designated and non-designated assets. | <ol style="list-style-type: none"> 1. Agreed, bullet will be added in relation to the protection and enhancement of the historic environment. 2. The detailed policies in relation to heritage assets will clarify that this includes designated and non-designated heritage assets. |

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| BLPIO-120 | Mr Robert Adey | | 04/12/22 21:01 | <ol style="list-style-type: none"> 1. Birmingham has and will continue to have a significant unmet housing plan which will require housing supply in neighbouring councils (example Ashby and Swadlincote). 2. Those affected by the housing shortfall in many instances are employed within Birmingham and the Council should make it easy to commute in. For example through plentiful car parking at HS2 interchange. | <ol style="list-style-type: none"> 1. Ashby and Swadlincote are not within the Birmingham and Black Country Housing Market Area. 2. The HS2 Interchange falls within Solihull Council's administrative area. Details about parking provision can be found through the Urban Growth Company, the special delivery vehicle set up by Solihull Council to deliver the Interchange. |
| BLPIO-160 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 12:30 | We wish the ambition to build the chords at Camp Hill to be included in the Birmingham Plan | Birmingham City Council, as a constituent member of the West Midlands Rail Hub Executive, is signed up to and support of delivery of Midlands Rail Hub. |
| BLPIO-220 | Chris Lowe | Push Bikes | 12/12/22 18:06 | <p>The issues are correctly identifies the climate crisis, the dominance of private motor vehicles, and the need to improve cycling provision.</p> <ul style="list-style-type: none"> • There must be a network approach to planning cycle infrastructure. • The variety of different cycles that are used, as mobility aids as well as for carrying families and cargo, need to be planned for. | The Council recognises the health benefits of cycling and is aware that cycling has great potential for longer journeys, especially with the growth in -e-cycle use. A network approach to cycling infrastructure is valuable and the Council will continue to work with TfWM and regional colleagues to facilitate this. There is both a regional and Birmingham City Council Local Cycling and Walking Infrastructure Plan. The Council will continue to develop cycle schemes and canal towpath improvements including new |

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| | | | | <ul style="list-style-type: none"> • Cycle use is not only for short journeys and cycle infrastructure has to reflect that. • Encouraging cycle use can bring very substantial health benefits to Birmingham. | <p>cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycling security and wayfinding. Working with TfWM and partners, the range of different cycles available for public use is being extended. The Council's e-cargo bike scheme aims to raise the profile of e-cargo bikes through the different uses carried out by project partners and suggestions on different e-cargo vehicles are welcomed.</p> |
| BLPIO-260 | Unknown | Westside Business Improvement District | 13/12/22 15:27 | <ol style="list-style-type: none"> 1. Agree with all of the challenges identified. 2. Every effort should be made to incorporate sensible and realistic measures within new development to address impacts of climate change but new requirements should not be overly prohibitive in cost terms, which will render them undeliverable and undermine the success of any future policy. 3. A new generation of modular nuclear reactors (MNR's) must be given a home within our city as our | <ol style="list-style-type: none"> 1. Support noted. 2. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. 3. Opportunities for renewable energy generation will be explored. The City Council are undertaking work to look at opportunities for solar within the city. Where a planning application is required, developments will need to |

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| | | | | <p>green contribution to zero carbon objectives.</p> <p>4. Continued success of the area will be dependent upon the improvement of infrastructure including the digital economy, whilst at the same time, protecting heritage assets.</p> <p>5. The Westside BID would welcome the opportunity to work with the Council.</p> | <p>meet the requirements of our current renewable energy policy and any subsequent policy updates. Alongside the planning process, opportunities for retrofitting renewable energy will be promoted. Many of these do not require planning permission.</p> <p>4. The plan identifies the improvement of digital infrastructure and protection and enhancement of heritage assets as objectives to be achieved.</p> <p>5. Engagement and support welcomed.</p> |
| BLPIO-365 | Rosamund Worrall Unknown | Historic England | 21/12/22 12:52 | Broadly agree however limited with respect to the historic environment | Comment noted. |
| BLPIO-373 | Tammy Stokes | Sandwell Metropolitan Borough Council | 21/12/22 14:09 | SMBC agrees with the challenges and opportunities set out in the document and supports its broad vision and objectives. | Support noted. |
| BLPIO-433 | Becky Clarke | BCC Lead Local Flood authority | 30/12/22 08:45 | 1. Changing climate is a significant challenge for the city. Most of the city's water infrastructure was not designed to meet future climate change challenges | Points 1 -5 are noted. In relation to Point 6, the integration of water management and green/ blue infrastructure will be a core principle in achieving the objective of |

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| | | | | <ol style="list-style-type: none"> 2. The implementation of Policies TP2, TP6 and TP7 mean that new developments are more resilient to the impacts of climate change 3. Birmingham LLFA has a key role in ensuring that flood risk is reduced within the city, by managing surface water at its source and slowing the flow of rainwater through the network of sewers and rivers within the city. 4. They seek the renaturalisation and deculverting of watercourses, and for new developments to make space for water issues 5. They request that developers deploy nature and biodiversity enhancing solutions to manage flood risk rather than schemes that seek an engineering solution that attenuates water underground in pipes or tanks. 6. Integration of water management and green / blue infrastructure should be a core principle of creating a sustainable future for Birmingham. | <p>creating a resilient and sustainable Birmingham.</p> |
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| BLPIO-445 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 11:20 | Agree in particular with the challenge 'delivering quality homes and places' given the very high housing need figure and the limited capacity within the city to accommodate development. | Comment noted. |
| BLPIO-582 | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:37 | Largely agree with the challenges and opportunities listed, in particular creating a sustainable future and the link to the sustainable development goals | Support noted. |
| BLPIO-19 | Mrs Nuala Palmer | | 07/11/22 17:01 | <ol style="list-style-type: none"> 1. Buses and trains are unreliable and not safe. 2. Poor electric vehicle charging infrastructure. 3. Over reliance on the private car, feels safer. 4. We don't have a museum that celebrates our history. 5. Why are we encouraging people to come and live in HMOs from all over the country. The Council is funding this. | <ol style="list-style-type: none"> 1. The operation of trains and buses falls outside of the remit of the planning system. Transport for West Midlands (TfWM) is the public body responsible for co-ordinating transport services in the West Midlands. 2. The City Council has recently published a city-wide EV charge point strategy which aims to ensure that residents (particularly those who do not have access to off-street parking), taxi drivers, commercial fleets and visitors to the city, have access to a convenient charge point when they choose to go electric. The first phase of the strategy saw 394 |

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| | | | | | <p>fast (22kw) and rapid (50kw) charge points installed at end of 2022. The second phase will increase the number of charge points to 3,600 by 2032. Make the switch Electric vehicles Birmingham City Council</p> <p>3. The Birmingham Museum and Art Gallery is currently closed for essential maintenance work and will reopen in 2024. Birmingham Museums Trust is embarking on making the museum and the organisation more representative of the people of the city with a new approach to galleries and displays, all created in partnership with the people of the city. Throughout 2023 the Trust will be working with people and partners across the city to develop new displays so that they tell the stories and display the objects that people most want to see when the museum reopens.</p> <p>4. The growth in the Supported Exempt Accommodation sector was investigated through an inquiry of the Council's Co-ordinating Overview and Scrutiny Committee. Its report was published in December 2021 and</p> |
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| | | | | | highlights the contributing factors to the significant increase in exempt accommodation since 2017. |
| BLPIO-46 | Mr Mike Mounfield | Colmore BID | 21/11/22 15:52 | Yes | Support noted. |
| BLPIO-66 | Mr Chris Brammeier | Warwickshire County Council Lead Local Flood Authority | 28/11/22 10:21 | As an increasingly urbanised city, changes in rainfall could lead to issues around flooding. Sustainable Drainage should be incorporated within all development. | The Issues and Options Document recognises that the Plan will need to ensure developments are designed and futureproofed against the impact of climate change. Climate resilience measures include mitigating surface water flood risk through Sustainable Drainage Systems. The Plan will reinforce this and acknowledge that growth of the city will mean an increased need to ensure developments incorporate Sustainable Drainage Systems. |
| BLPIO-70 | Ms Karen Newman | BOM (Birmingham Open Media) | 28/11/22 11:50 | <ol style="list-style-type: none"> 1. Overall agreement with themes (proud of Birmingham and City of layers) 2. Cultural offer is key as city potentially shifts from a retail towards experience driven economy 3. Digital economy challenges should not focus solely on infrastructure. | <ol style="list-style-type: none"> 1. Support noted 2. Comment noted and the importance of cultural facilities to achieving the vision and objectives of the Plan will be recognised. 3. The Plan will seek to ensure services and facilities meets the needs of the population and are accessible to all. |

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| | | | | <p>Disability and socio economic barriers are particularly important in Birmingham</p> <p>4. Parts of city centre facing decline, notably Southside District and further potential decline as the BBC moves from the Mailbox. Smithfield should connect with its neighbouring districts - in its current form there is a risk they are being cut off.</p> <p>5. City needs to be more joined up with better pathways favouring pedestrians and cyclists and towards areas with less footfall</p> <p>6. In line with the levelling up agenda, the city centre needs the same view ie China Town and the Gay Village require additional investment.</p> <p>7. How does HS2 and Smithfield affect New St and the routes between Curzon Station and New Street?</p> | <p>In response to points 4-7, the Smithfield Masterplan aims to ensure that the development connects the site to the wider city including the enhancement of walking, cycling and public transport to and from the site. The north-south pedestrian boulevard will reconnect the area to the City Centre Core, Digbeth and the wider South Gateway. The integration of the public transport route along Bromsgrove Street will be vital to accessibility.</p> <p>Brand new mass rapid transport facilities will be brought into the site through the creation of a dedicated green route for the Midland Metro. This will run through the site along an extended Sherlock Street with a stop between Festival Square and the new residential community. It will provide quick and convenient connections to New Street Station, Moor Street Station, Birmingham Coach Station, the HS2 terminus at Birmingham Curzon and the wider city. It could form the first phase of a wider route into the south of the city. A focus for interchange between public transport modes within the site will be important with bus/sprint stops at key and convenient points, and smart technology will be used to aid its efficient use.</p> |
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| | | | | | <p>The quality of the streets surrounding the site will be improved to create a street scene that is rationalised and effective in its movement of traffic, with active frontages and high quality public realm. This will ensure integration of the redevelopment with surroundings and support pedestrian movement.</p> <p>The closure of Park Street and Moor Street to private vehicles, as per plans associated with HS2, will change the feel and function of Digbeth High Street. Similarly, Pershore Road will be greatly improved, with public realm and junction improvements forming part of a pleasant walking route between Birmingham Smithfield, Southside and Birmingham New Street that takes in Southside's newly pedestrianised Ladywell Walk and planned Theatre Square.</p> |
| BLPIO-95 | <p>The Tyler Parkes Partnership Ltd</p> <p>Gail Collins</p> | <p>West Midlands Police</p> | <p>02/12/22 18:40</p> | <ol style="list-style-type: none"> 1. The CCWMP requests that in accordance with national planning policy, the theme of community safety and crime prevention is given prominence in the Birmingham Local Plan Issues & Options consultation, including in the challenges identified, to promote improvements in community safety, reducing crime, fear of crime and | <ol style="list-style-type: none"> 1. The creation of safe and inclusive communities will be identified as a challenge in the Plan. 2. We will continue to work with West Midlands Police regarding policies securing the safety of residents, visitors and businesses within Birmingham. |

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| | | | | <p>anti-social behaviour, which are vital objectives in the context of creating sustainable communities.</p> <p>2. Development can place an increased demand on police resources, both in terms of the need for additional capital investment in new police facilities and funding for additional police officers and staff. In order to sustain the huge level of growth proposed in the Birmingham Local Plan Issues & Options and to meet national and local policy objectives relating to safety and security, contributions will be required through CIL/ S.106 agreements to help fund the provision and maintenance of Police services.</p> <p>3. Recorded crime in the city has increased by at least 20% since 2016 and this trend is continuing, however, the Birmingham Local Plan Issues & Options, fails to prioritise all areas of crime adequately and is too narrow in scope and not proportionate in the context of the evidence base which should underpin the Local Plan.</p> | <p>3. The evidence base on crime (contained in the Sustainability Appraisal) is considered to be proportionate.</p> <p>4. Comment noted.</p> <p>5. The Sustainability Appraisal evidence will be updated with the latest crime statistics available at the time of preparation.</p> |
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| | | | | <p>4. It is noted from the accompanying Sustainability Appraisal that each option/ proposed policy change should be assessed against a framework of sustainability topics, including an assessment of whether policies will reduce the fear of crime, anti-social behaviour and promote design that discourages crime.</p> <p>5. Crime statistics in the SA of the Issues and Options needs updating. Crime rate in the year ending March 2022 of 138.13 recorded crimes per 1,000 population, some 34% higher than set out by the Council, see: Compare your area Police.uk (www.police.uk)</p> | |
| BLPIO-139 | Mr John Pearce | Bloor Homes | 05/12/22 10:06 | Generally in agreement with the challenges and opportunities identified. | Support noted. |
| BLPIO-155 | Gwyn James | Kier Highways | 05/12/22 11:23 | <p>Maintenance of infrastructure needs to be included in sustainability objectives in new plans:</p> <p>“What does sustainable development mean...” to read: "Designing for long-term sustainability where maintainability is a key</p> | Agree, bullet will be added to section 'What does sustainable mean in Birmingham?' reading - "Factoring in the long-term maintenance of infrastructure." |

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| | | | | consideration so that the ease and cost of cyclical, routine and major maintenance is integral to any proposal" | |
| BLPIO-196 | IO Consultation Event - Sutton Cold | | 05/12/22 16:56 | <ol style="list-style-type: none"> 1. Too many HMOs 2. Need development on brownfield sites and not on green belt 3. Sites with demolished buildings are often neglected afterwards 4. New developments should include the right supporting infrastructure i.e. doctors, roads, schools 5. Do not support HS2 6. Not enough police presence especially given anti social behaviour 7. Delivery drivers block disabled car spaces | <ol style="list-style-type: none"> 1. The Council recognises that high concentrations of HMOs can be harmful to residential amenity and balanced communities and is committed to maintaining and creating thriving sustainable neighbourhoods. The Council introduced a city-wide Article 4 Direction in June 2020 which means that planning permission is required to change from a dwellinghouse to a small HMO (Use Class C4). We also adopted a stronger planning policy on HMOs (Policy DM11 in the Development Management in Birmingham Document) in December 2021 and a detailed Supplementary Planning Document on HMOs in April 2022. With these three tools in place, the Council will be able to better manage the growth of HMOs across the city. 2. The Council will continue to promote brownfield regeneration. |

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| | | | | | <p>3. The Government is looking at measures to tackle the issue of slow build of permissions. This includes proposals to make delivery a material consideration in planning applications. This could mean that "applications with trajectories that propose a slow delivery rate may be refused in certain circumstances," (NPPF Prospectus Consultation Document, December 2022)</p> <p>4. The Birmingham Local Plan will be supported by an Infrastructure Delivery Plan which will set out the infrastructure required to support development and outlines who will provide it.</p> <p>5. HS2 will enhance the city's connectivity and improve rail capacity.</p> <p>6. Policing is not a planning matter. However, the Birmingham Local Plan will contain policies which seek to create safe and secure environments.</p> |
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| | | | | | 7. Illegal parking is not a planning a matter. |
| BLPIO-238 | Mrs Michaela Moore | Hammerson - Bullring and Grand Central | 13/12/22 12:39 | Hammerson would like to ensure that the Plan sets realistic and deliverable policies that do not inadvertently or otherwise act as a disincentive to investment and therefore suggest it would be sensible to consider phasing of some requirements particularly where this represents a significant change from current policy. | The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. |
| BLPIO-287 | Naomi Paul | Co-Ordinator, Perry Barr Constituency Housing Action Group | 14/12/22 08:32 | Our particular focus is the impact of high concentrations of Exempt Accommodation, HMOs and C2 Residential institutions on residential amenity and neighbourhood sustainability. | Comment noted. |
| BLPIO-297 | Mr Colin Griffiths | Satnam Group | 14/12/22 12:23 | The development needs cannot be accommodated within the existing urban area, and green belt will be required. These sites should be located in areas close to existing communities and provide affordable housing. | Comments noted. |
| BLPIO-315 | Paul Gilmour | Dale Farm | 14/12/22 15:42 | <ol style="list-style-type: none"> 1. Global leader green future - the last line should not be a priority and is not practical or deliverable. 2. Place quality & thriving neighbourhoods - with the | <ol style="list-style-type: none"> 1. As the city continues to require renewable energy in new developments and moves towards the use of new technologies as well as a retrofit programme, it is |

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| | | | | exception of those benefitting from CIL payments, how will BBC provide places that are healthier, cleaner and safer without additional funding. | inevitable that the city will become more resilient. 2. In areas, where no or little development is expected (for example, mature suburbs), non-planning mechanisms will be used to create healthy, clean and safe places such as parks maintenance, School Streets, 20mph zones, implementation of the non-planning related measures in the Birmingham Transport Plan and Housing Strategy. |
| BLPIO-324 | | Housebuilders Consortium (Barton Willmore) | 14/12/22 16:02 | The Issues and Options Consultation Document does not present any questions which directly relate to the quantum of Birmingham's Local Housing Need, or the extent of this need which cannot be accommodated within the City. | Despite the fact that there is no specific question relating to the quantum of housing need, the Issues and Options Document does clearly set out the extent of the housing need which cannot be accommodated within the city based on the current assessment of available land (at the time of the preparation of the Issues and Options). This was set out in paras 4.15. |
| BLPIO-332 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:27 | 1. Greater investment in transport infrastructure which allows more people to access the city centre and other hubs of economic activity in the West Midlands is needed. | 1. Agreed, the Council will continue to work with Transport for West Midlands (TfWM) which is the public body responsible for co-ordinating |

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| | | | | <ol style="list-style-type: none"> 2. High density urban regeneration will help in creating high-quality urban neighbourhoods. 3. Commercial vacancy rates in Birmingham are 1.1%, indicate a severe lack of suitable commercial space for firms to occupy. High-quality new commercial space on city centre brownfield land should be part of a strategy to draw economically productive firms to the city. 4. A skilled workforce is vital for attracting businesses to a city and enabling those businesses to grow. Although the West Midlands has a young population and large employment base, it is relatively less well-educated than comparable markets. 5. Poor graduate retention and particularly around scientific and technology, information and communication, financial and insurance sectors. Opportunity for City to attract businesses in these target areas. Need high quality | <p>transport services in the West Midlands.</p> <ol style="list-style-type: none"> 2. In line with national policy, the Local Plan will seek to optimise densities on housing sites to make better use of land in line with national policy while ensuring that high quality living environments are created and the full range of identified housing needs are met. 3. The HEDNA recognises that there is low vacancy and high demand for industrial premises in the city, even though the quality of many industrial premises is poor. The recommended approach in the HEDNA and carried forward in to the Issues and Options document is one of renewal - i.e. the redevelopment of existing industrial uses as well as the development of new uses. This approach will help to meet the needs of existing businesses within the city as well as attract new businesses to locate here, and it will maximise the use of brownfield land. 4. A highly skilled workforce is instrumental in improving productivity. Improving the skills of |
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| | | | | <p>housing to attract this subset of the labour market.</p> | <p>Birmingham residents is a priority for our city and our region. Latest figures suggest, Birmingham (10.8%) has a greater proportion of working age residents with no qualifications compared to the core city average of 8.4%. The city (57.9%) also has a correspondingly lower proportion of residents with NVQ3+ qualifications than and core city average (63.1%). In recognition of this skills gap, productivity and skills continues to be one of the key priorities for the Greater Birmingham and Solihull Local Enterprise Partnership and the West Midlands Combined Authority.</p> <p>5. The ability of a city to retain its graduate population is an important factor in determining the quality of its labour force and improving the region’s skills base. A report by WM-REDI and the University of Birmingham (Graduate pathways: Identifying patterns of regional retention and attraction) provided valuable information around graduate retention. The report highlighted the complexity around the factors affecting retention, from degree</p> |
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| | | | | | classification, age, ethnicity, type of degree, type of institution to name a few. Using the 2018/19 graduate cohort, statistic show that the UK had a 58.1% graduate retention rate – the West Midlands figure was 50.8%, higher than both South-East England and South-West England – with London having the greatest retention rate of 74%. |
| BLPIO-407 | Calthorpe Estates | | 29/12/22 12:55 | Calthorpe support the challenges and opportunities that have been identified. They are not unique to Birmingham and therefore presents an opportunity to work with other partners. | Support noted. |
| BLPIO-464 | Mr James Chatterton | William Davis Ltd | 30/12/22 13:58 | Agree in particular with the challenge 'delivering quality homes and places' given the very high housing need figure and the limited capacity within the city to accommodate development. | Comment noted. |
| BLPIO-504 | Dr Peter Fawcett | Gladman Developments Ltd | 03/01/23 16:17 | Yes | Support noted. |
| BLPIO-512 | | Midland Land Ltd | 04/01/23 09:22 | Generally agree but consider that that identifying the housing shortfall as a significant challenge is underplaying the | The Council recognises the need for Birmingham to work co-operatively with other local authorities and bodies in the wider area |

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| | | | | <p>issue. It should instead be identified as an impossibility within the city and that neighbouring authorities will need to accommodate as much of the shortfall as possible.</p> | <p>to deal with issues that run across local authority boundaries. This joint working is critical for Birmingham as, stated in the Issues and Options Document, we are unlikely to be able to meet all of our development needs within our boundary. At the same time, we have to consider any unmet development needs from our neighbours. Birmingham will need to continue to work effectively with neighbours to achieve a planned response to the issues, particularly in relation to housing shortfalls.</p> |
| <p>BLPIO-536</p> | <p>Mr David Joseph</p> | <p>Bloor Homes</p> | <p>05/01/23 08:51</p> | <p>Generally agree but consider that that identifying the housing shortfall as a significant challenge is underplaying the issue. It should instead be identified as an impossibility within the city and that neighbouring authorities will need to accommodate as much of the shortfall as possible.</p> | <p>The Council recognises the need for Birmingham to work co-operatively with other local authorities and bodies in the wider area to deal with issues that run across local authority boundaries. This joint working is critical for Birmingham as, stated in the Issues and Options Document, we are unlikely to be able to meet all of our development needs within our boundary. At the same time, we have to consider any unmet development needs from our neighbours. Birmingham will need to continue to work effectively with neighbours to achieve a planned response to the issues, particularly in relation to housing shortfalls.</p> |

Question 2 - Are there any other challenges and opportunities which are important?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-53 | Mr Alex Jones | Gladman Retirement Living ltd | 23/11/22 10:36 | Increasing the supply of appropriate accommodation for older people should be acknowledged as a specific challenge and opportunity in the plan. | The Challenges and Opportunities section provides a high level overview. It is acknowledged that there is a need to provide more homes and different types and sizes and homes to meet the city's housing needs. This will include homes of older people. The plan objectives captures the need to provide for the range of house sizes, types and tenures to meet the city's housing needs. |
| BLPIO-118 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 20:47 | The Local Plan Review needs to deal effectively with Birmingham Wheels Park - either through consolidation and reopening of the facilities on-site or through relocation prior to demolition of the existing facilities. | Comments are noted. Please see previous response to Q.1 |

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| BLPIO-130 | Mr David Carter | Tyler Parkes | 05/12/22 09:06 | Delivering on sustainable development is critical. It should recognise there is a balance to be struck in accommodating the scale and pattern of development in the city, moving forward. | The sections 'What does sustainable development mean for the Birmingham Local Plan?' and the 'Vision and Objectives' show that various and sometimes competing objectives will be required to deliver sustainable development. A recognition that a 'balance' must be struck or 'compromises' made will be included in the Objectives section. |
| BLPIO-146 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:43 | Climate and ecological crises are inextricably linked, and that nature's recovery is vital for tackling climate change. Nature Recovery should therefore be included in the list of Opportunities | Additional wording will be added to the 'Opportunities' to recognise the link between the climate challenge and nature recovery. |
| BLPIO-182 | Mr Peter Chambers | David Lock Associates on behalf of Birmingham Property Services | 05/12/22 15:18 | Co-operation is required with other authorities in the HMA to meet the development needs of the area. | The Council recognises the need for Birmingham to work co-operatively with other local authorities and bodies in the wider area to deal with issues that run across local authority boundaries. This joint working is critical for Birmingham as we are unlikely to be able to meet all of our development needs within our boundary. At the same time, we have to consider any unmet development needs from our neighbours. Birmingham will need to continue to work effectively with neighbours |

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| | | | | | to achieve a planned response to the issues, particularly in relation to housing shortfalls. |
| BLPIO-250 | | West Midlands Housing Association Planning Consortium (WMHAPC) | 13/12/22 13:57 | Encourage developers to have early active engagement with Housing Associations in the next round of consultation. | WMHAPC's comments and offer of engagement are welcomed. Individual housing associations have also been consulted on the Issues and Options Document and have been engaged in the development of the Council's recently published Housing Strategy. We will continue to engage with WMHAPC and housing associations in the preparation of the Birmingham Local Plan. |
| BLPIO-340 | Mr John Careford | Stratford-On-Avon District Council | 20/12/22 16:20 | Joint working will be critical in relation to cross-boundary issues, as it is identified that Birmingham will not be able to meet all of its development needs within its boundary. In addition to achieving a planned response to delivering required housing, we also consider that related infrastructure requirements are a critical consideration, and welcome discussions on the matter. | Comments noted and ongoing discussions will be held. |
| BLPIO-350 | Patrick Jervis | Lichfield District Council | 20/12/22 17:24 | There is a clear statutory requirement to co-operate on cross-border matters and BCC outline this - they have prepared a Statement of Common Ground with LDC | Comments noted. |

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| | | | | which demonstrates their intent on the matter. | |
| BLPIO-418 | Jane Field | Environment Agency | 29/12/22 15:21 | <ol style="list-style-type: none"> 1. Flood risk is a key issue for the city and crosses boundaries with neighbouring authorities. 2. A flood risk policy covering all types of flooding should be included in the Plan. 3. Birmingham is currently undertaking a Level 1 Strategic Flood Risk Assessment. For sites where a Level 2 is required, funds should be set aside for this 4. The Environment Agency input outside of statutory Local Plan work is chargeable 5. All new development proposals should ensure designs explore opportunities to reduce flood risk and are appropriately flood resistant and resilient. 6. Further assessment should be undertaken to determine whether there is flood risk elsewhere in the catchment which would benefit from being | <ol style="list-style-type: none"> 1. Comment noted. The Council will continue to work in co-operation with other local authorities and bodies in the wider area to deal with issues that run across local authority boundaries. 2. A flood risk policy covering all types of flooding and watercourses will be included in the Plan. 3. For allocated sites within areas of flood risk identified within the Level 1 SFRA a Level 2 SFRA will be undertaken. 4. It is noted that the Environment Agency input outside of statutory Local Plan work is chargeable. 5. The Local Plan will include policies to ensure development reduces flood risk and is designed to be appropriately flood resistant and resilient including the need for further assessment where there is a flood risk elsewhere in the catchment. |

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| | | | | <p>reduced as part of the development, and also whether there may be opportunities to provide that betterment as part of the scheme.</p> <p>7. The Local Plan presents an opportunity for Biodiversity Net Gain. Where development is adjacent to rivers opportunities should be explored to enhance the river such as re-naturalisation, de-culverting and removal of barriers to fish passage.</p> | <p>6. Agree, that where development is adjacent to rivers opportunities, developers should be encouraged to explore the enhancement of the river such as re-naturalisation, de-culverting and removal of barriers to fish passage and ensure an adequate easement is provided for access and maintenance and sufficient space for future flood risk management schemes as well as connecting habitats and active transport routes.</p> |
| <p>BLPIO-443</p> | <p>John Heywood</p> | <p>Eco Sutton</p> | <p>30/12/22 10:44</p> | <p>1. All city council decisions should be made in the light of how the policy contributes to the reduction in carbon emissions.</p> <p>2. The Council should take into account embedded carbon.</p> <p>3. Langley should be delivered as an exemplar sustainable development scheme.</p> | <p>The climate emergency is a fundamental consideration in shaping the Birmingham Plan. The recently commissioned sustainability study will help to ensure that the Local Plan policies and allocations are responsive to the need to reduce carbon emissions across the City and set out how the Local Plan can ensure that embodied carbon is considered as part of the development process.</p> |

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| | | | | <p>4. Lack of encouragement from the city to the Consortium to share and own the green ambition.</p> <p>5. Lack of engagement with local councillors and residents.</p> <p>6. Need a organisation to help build community cohesion.</p> | The Langley SUE has outline planning permission which accords with the requirements of the policies within the Birmingham Plan. The reserved matters applications will be determined in accordance with the outline planning permission and the policies in place at the time the decisions are made. |
| BLPIO-471 | | Midlands Land Portfolio Ltd | 30/12/22 14:53 | There is development land within the city that can accommodate sustainable housing development. | Comment noted. |
| BLPIO-55 | Ms Libby Harris | Birmingham Friends of the Earth | 23/11/22 16:51 | Welcome the recognition to deliver a green economy which serve to progress and deliver on many of the challenges Birmingham may face and should be the overarching factor in planning decisions. | Support noted. |
| BLPIO-104 | Mr Antony Whitehead | Our Town | 03/12/22 08:57 | See main comments | Comments noted |
| BLPIO-160 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 12:30 | <p>1. Many external challenges including weaker wider economy, lack of long term funding, poor skills mix, underfunded city council.</p> | <p>1. Comments noted.</p> <p>2. The Plan will recognise the city's universities as innovation and research assets and as key employers. The Council will continue to work with the universities to</p> |

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| | | | | <p>2. Opportunities - better use of university presence and central location of the city</p> | <p>enable them to flourish and grow and for their strong academic and research base to stimulate growth in both the current and emerging business sectors.</p> |
| <p>BLPIO-220</p> | <p>Chris Lowe</p> | <p>Push Bikes</p> | <p>12/12/22 18:06</p> | <p>1. Including people with disabilities in the plans - the needs of people with disabilities is only mentioned once in the document</p> <p>2. Planning cycle infrastructure that is inclusive to all users, Wheels for Wellbeing have written an excellent guide that should be included in the evidence base. Link for wheelsforwellbeing.org.uk</p> <p>3. Cycle routes that include sections of ‘get off and push’ are not cycle routes and therefore need to be included separately</p> <p>4. Motorcycle barriers used to control access points to some green spaces around Birmingham are only accessible for a very narrow range of cycles. Birmingham’s green</p> | <p>1. The aspiration is to develop a plan for Birmingham that will create a successful, inclusive, connected and green city which includes creating places that are accessible to all.</p> <p>2. Suggestion to use Wheels for Wellbeing guide is welcome and has been noted.</p> <p>3. Comment noted.</p> <p>4. Agree that motorcycle barriers used to control access points to some green spaces cause accessibility issues. Comment is welcome and has been noted.</p> |

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| | | | | spaces must be accessible to all. | |
| BLPIO-228 | IO Consultation Event - Harborne | | 13/12/22 11:50 | <ol style="list-style-type: none"> 1. Lack of youth facilities 2. Open spaces and their facilities are important | <ol style="list-style-type: none"> 1. The Plan will seek to ensure our neighbourhoods are supported by services and facilities which meets the needs of different groups including young people. 2. The new proposed policy for open space will set out new quantity and access standards for open space provision including children and youth play space. |
| BLPIO-260 | Unknown | Westside Business Improvement District | 13/12/22 15:27 | Artist impressions of green scenery in development need to be accurate and not misleading. Submissions should include detail on how the green enhancements will be sustained, their life expectancy and maintenance etc. Those who mislead should be held accountable. | The Issues and Options Document does not contain artists impressions of greening of buildings. The Council is proposing to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design. We are proposing the introduction of an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments. |
| BLPIO-308 | Mr Graham Turner | Friends Of Hill Hook Local Nature Reserve | 14/12/22 15:08 | The ecology and biodiversity of the Hill Hook LNR site would be impaired and threatened by the impact of any further neighbouring new developments or very significantly increased footfall. The plan | The Plan will aim to protect, conserve and enhance the natural environment. Detailed policies will be prepared to ensure that development will not directly or indirectly |

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| | | | | should properly recognise and protect all sites in Birmingham of similar status. | cause harm to local sites of importance for biodiversity and geology. |
| BLPIO-365 | Rosamund Worrall Unknown | Historic England | 21/12/22 12:52 | <ol style="list-style-type: none"> 1. Historic environment is not noted in the opportunities. 2. Heritage is key to the emerging BLP and can be intrinsically linked to all the identified opportunities. Take advantage of the city's rich history whilst conserving and enhancing our historic environment. 3. With regards to strategic site allocations, the existing dataset contained in the Historic Landscape Characterisation information may be of use in identifying locations | <ol style="list-style-type: none"> 1. Reference to heritage assets will be included in the 'Opportunities' section. 2. Comment noted. 3. Comment noted. |
| BLPIO-433 | Becky Clarke | BCC Lead Local Flood authority | 30/12/22 08:45 | The integration of water management into the design of new developments has the potential to address a range of social, economic and environmental challenges in a holistic way. | Comment noted. |
| BLPIO-445 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 11:20 | There is development land within the city that can accommodate sustainable housing development. | Comment noted. |

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| <p>BLPIO-582</p> | <p>Councillor Julien Pritchard</p> | <p>Green Party Group</p> | <p>09/01/23 16:37</p> | <ol style="list-style-type: none"> 1. Question the terminology of economic growth in some references, and instead advocate the use of economic prosperity instead 2. Need to acknowledge more strongly the barriers that many minorities will face 3. Under bullet point 7 on page 10 increased development should be along rapid transit corridors and not just next to hubs 4. Areas which are currently lacking facilities (parks, shops, schools, libraries, rapid transport routes etc) need to be identified in order to target new facilities to areas currently missing them | <ol style="list-style-type: none"> 1. The term prosperity is used in para. 2.9. 2. It will be acknowledged that Birmingham is one of the first ‘super-diverse cities’ in the UK with half of its residents from an ethnic minority. It is therefore important to ensure that everyone is able to benefit from Birmingham’s growth and success. 3. Agreed, this will be amended to read ""Developing at higher densities, particularly in areas well served by public transport to support usage."" 4. An Open Space Assessment has been undertaken which shows where there are deficiencies in public open space. A Retail Needs Assessment has been undertaken to show where there are potential deficiencies in retail provision. Transport for the West Midlands will have an understanding of where there are deficiencies in the public transport system. |
| <p>BLPIO-22</p> | <p>Mr Joshua James</p> | <p>Severn Trent Water</p> | <p>09/11/22 12:22</p> | <p>No specific comments</p> | <p>Noted</p> |

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| BLPIO-83 | Mr John Pearce | Bloor Homes | 01/12/22 12:11 | A policy mechanism which sets out the need to work across boundaries within the HMA should be a key objective of the Plan. | The Duty to Cooperate already requires local planning authorities to engage with other relevant authorities and bodies constructively, actively and on an ongoing basis on strategic planning matters. |
| BLPIO-105 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 10:50 | Heritage Assets should be seen as opportunities not just challenges. They enhance Birmingham as a 'city of layers', encourage pride in our shared history, and enhance economic tourism. | The 'Opportunities' section recognises Birmingham's history as important to our 'city of layers'. Heritage is referred to in the 'Proud of Brum' opportunities section. The word assets will be added. |
| BLPIO-129 | Ms Mary Keelan | Hinstock Philip Victor Residents Assoc | 05/12/22 07:50 | <ol style="list-style-type: none"> 1. Working in multi-disciplinary teams is vital for city planning 2. Distributing housing benefit to failing providers is woeful mismanagement of public monies and is not mentioned in the plan. | <ol style="list-style-type: none"> 1. It is agreed that planners will need to work collaboratively with other disciplines both internally and externally to deliver the objectives of the Plan. 2. The distribution of housing benefits is not a planning matter and cannot be taken into consideration when making decisions on planning applications. |
| BLPIO-153 | Mrs Fiona Adams | The Moseley Society | 05/12/22 11:05 | <ol style="list-style-type: none"> 1. There are many other challenges including, sluggish local, national and global economy; lack of funding for new initiatives; insufficient skills training; a City Council that is | <ol style="list-style-type: none"> 1. There are many social, environmental and economic challenges, but the ones identified are the ones the Council considers could be realistically addressed within the scope of a Local Plan. |

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| | | | | <p>large, complex and underfunded etc</p> <p>2. Opportunities: More could be made of the large university presence; geographic location in the centre of the country is a logistical strength.</p> <p>3. The Plan puts almost all its emphasis on new development, but more emphasis should be put on the value of the historic environment and conservation areas</p> <p>4. Is the C02 locked into concrete calculated when permission is given to demolish rather than refurbish old buildings</p> | <p>2. The Plan will recognise the city's universities as innovation and research assets and as key employers. The Council will continue to work with the universities to enable them to flourish and grow and for their</p> <p>strong academic and research base to stimulate growth in both the current and emerging business sectors.</p> <p>3. Birmingham's character is shaped by its historic development, which is represented by a rich and varied environment consisting of archaeological remains, historic buildings, townscapes and landscapes. The Plan will continue to ensure the historic environment is valued, protected and enhanced.</p> <p>4. Embodied carbon is currently not taken into account when planning permission is given to demolish a building. We will be looking to test policies (through the preparation of the Birmingham Local Plan) that deal with all of the carbon associated with new buildings including the</p> |
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| | | | | | <p>energy needed to power them (operational energy) and that needed to construct and decommission them (embodied energy). This is known as whole life carbon. Only operational carbon is covered in Building Regulations.</p> |
| <p>BLPIO-229</p> | <p>IO Consultation Event - Harborne</p> | | <p>13/12/22 11:51</p> | <ol style="list-style-type: none"> 1. Lack of youth facilities 2. Open spaces and their facilities are important | <ol style="list-style-type: none"> 1. Local Plans should provide social, recreational and cultural facilities and services the community needs. This could include local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship and other local services to enhance the sustainability of communities and residential environments. The Plan will seek to ensure our neighbourhoods are supported by services and facilities which meets the needs of different groups. 2. The new proposed policy for open space will set out new quantity and access standards for open space provision including children and youth play space. |

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| <p>BLPIO-289</p> | | <p>Henley Investment Management Ltd</p> | <p>14/12/22 11:08</p> | <ol style="list-style-type: none"> 1. The proposals of the Local Plan should not predetermined by the non-statutory vision of the OFCP. 2. Financial viability and deliverability of new development must be of paramount importance in the setting of policy. 3. It will be important for the City Council to ensure that there is appropriate engagement with landowners and the public. 4. It is important for the Plan to acknowledge that the effects of HS2 and the opportunities which that step change affords, will not be confined to the Enterprise Zone. 5. Need more investment in transport infrastructure. 6. Development opportunities in the city centre needs to be harnessed and maximised. 7. Support higher densities. | <ol style="list-style-type: none"> 1. The Plan will not be pre-determined by the OFC Central Area Framework but the evidence and consultation results can be used to inform the Local Plan. 2. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its collective policy requirements do not increase development costs to the point where development cannot or does not happen. 3. Comment noted. The Council will ensure appropriate engagement in accordance with its Statement of Community Involvement. 4. Commented noted and agreed. 5. Comment noted. 6. Comment noted. 7. Support noted. 8. The Plan will seek to ensure a sufficient supply of employment land to meet the need over the plan period is accommodated within Birmingham. |
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| | | | | <p>8. Lack of high quality new commercial space.</p> <p>9. Targeted investment to draw highly-skilled, high-income employment of many forms into the city must go alongside densification.</p> <p>10. A skilled workforce is vital for attracting businesses to a city and enabling those businesses to grow.</p> <p>11. The 14 bullet points in the I&O defining sustainable development are generally supported.</p> | <p>9. The ability of a city to retain its graduate population is an important factor in determining the quality of its labour force and improving the region's skills base.</p> <p>10. A highly skilled workforce is instrumental in improving productivity. Improving the skills of Birmingham residents is a priority for our city and our region.</p> <p>11. Support noted.</p> |
| BLPIO-384 | Carl Mellor | Dudley Metropolitan Borough Council | 21/12/22 16:03 | The development capacity of Birmingham City should be maximised, with the housing and employment needs of the authority met as far as possible within its own boundary. Support utilising as much brownfield land as possible and developing near public transport hubs at higher densities. | The development strategy seeks to focus and maximise growth predominantly within the existing urban area through the regeneration of brownfield land and optimising of development densities. |
| BLPIO-422 | Jon Morris | Acocks Green Focus Group | 29/12/22 15:29 | 1. Centralising services runs contrary to the objective to | 1. The plan will explore how the liveable neighbourhood concept can be applied and supported through the local plan to enable residents to |

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| | | | | <p>achieve liveable neighbourhoods.</p> <p>2. Need to focus economic growth on small existing businesses within the city rather than from inward investment. Council owned land should be used to achieve economic growth.</p> | <p>access day to day needs within a 15 or 20 minute walk or bike ride from their home. This can help to reduce car use, encourage active travel and help to address the climate emergency, imbalances in access to services and facilities and improve the health and well-being of all residents.</p> <p>2. A Housing and Economic Development Needs Assessment (HEDNA) has been undertaken which assesses the future requirements for both economic development and housing. Ensuring that an adequate supply of employment land is maintained throughout the plan period will be essential in enabling long-term balanced growth to be sustained. The HEDNA has found that there is a significant unmet need for small to medium sized sites to meet the needs of SMEs operating or wishing to set up within the city. The new portfolio of employment land recommended by the HEDNA is therefore to continue to require an ongoing 5 year reservoir of readily available employment land, but that this should be refocused on</p> |
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| | | | | | supporting the delivery of small to medium sized sites to cater for locally generated needs. We are proposing to amend the employment land portfolio to reflect this. |
| BLPIO-454 | Ben Simm | National Highways | 30/12/22 12:38 | The Council needs to work with Highways England to understand the impact growth will have upon the SRN and identify suitable mitigation to minimise the impact, or improvements to enable the development to come forward in a sustainable manner. | The Council is committed to working with Highways England to ensure any impact of development on the SRN is minimised and mitigated. |
| BLPIO-482 | | MKF Investments | 03/01/23 11:24 | Greenfield land in accessible locations should be seen as an opportunity. | Comment noted. |
| BLPIO-518 | | Druids Heath Consortium | 04/01/23 11:09 | Predominance of apartment-led development and the lack of affordable housing delivery should also be identified as significant challenges. | The challenges of boosting affordable housing supply and providing for a range of house types, sizes and tenures that meets the city's identified needs have been articulated in the Issues and Options Document and are proposed as key objectives for the Plan to address. |
| BLPIO-19 | Mrs Nuala Palmer | | 07/11/22 17:01 | 1. Challenge should include addressing the many hotels that are being used to house illegal migrants. | <ol style="list-style-type: none"> 1. The residential status of persons staying in a hotel is not a planning matter. 2. The Plan will set targets for the delivery of housing including |

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| | | | | <p>2. More council housing is needed with affordable rents.</p> <p>3. Crime is a challenge in Birmingham. Drug dealing is open, bold and without fear.</p> <p>4. Ensure we all have access to green spaces, yet you are charging to park a car at parks. Are parks even safe?</p> <p>5. Access to a doctor is almost impossible. People are dying waiting for ambulances.</p> | <p>affordable housing. The Council has built around 3,000 new homes since 2009 through the Birmingham Municipal Housing Trust and its 10 year delivery programme seeks to build a further 3,000 over the next 7 years.</p> <p>3. The role of the planning system in relation to crime aims to achieve healthy, inclusive and safe places - for example through the use of attractive, well-designed, clear and legible pedestrian cycle routes, high quality public spaces which encourage the active and continual use of public areas.</p> <p>4. Ensuring good access to green spaces does not mean ensuring a free parking space is available at green spaces. Ensuring good access means aiming to ensure that residents have access to an area of public open space within a certain distance.</p> <p>5. Waiting times for medical appointments and emergency medical attention falls outside the remit of the planning system and is a</p> |
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| | | | | | matter for national Government and the NHS. |
| BLPIO-70 | Ms Karen Newman | BOM (Birmingham Open Media) | 28/11/22 11:50 | Creative industries should be seen as a major opportunity, particularly creative digital industries | We agree that the growth of the digital and creative economy presents great opportunities. This needs to be underpinned by high quality future proofed digital infrastructure which provides the foundation for businesses to thrive. The Council is developing "The Creatively Birmingham Strategy" which will support an inclusive, accessible, sustainable and economically vibrant arts, culture and creative sector. |
| BLPIO-95 | The Tyler Parkes Partnership Ltd Gail Collins | West Midlands Police | 02/12/22 18:40 | <ol style="list-style-type: none"> 1. The Chief Constable of West Midlands Police supports the Council's analysis of the majority of the challenges identified 2. Whilst the Council states that strategic policies should make sufficient provision for infrastructure for security and creating safer places is identified as an opportunity, there is no reference in the challenges or opportunities to reducing fear of crime, anti-social behaviour or | <ol style="list-style-type: none"> 1. Support noted. 2. The creation of safe and inclusive communities will be identified as a challenge in the Plan. 3. A summary of the consultation on the first stage of Our Future City: Central Birmingham 2040' (January 2021) was published on the Council's website at the beginning of the Issues and Options consultation period. |

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| | | | | <p>promoting design that discourages crime. This is a key omission, particularly given the city's high crime rate.</p> <p>3. The consultation summary on the first stage 'Our Future City: Central Birmingham 2040' (January 2021) has not been provided.</p> | |
| BLPIO-238 | Mrs Michaela Moore | Hammerson - Bullring and Grand Central | 13/12/22 12:39 | The plan should also recognise that development viability is also a significant and ongoing challenge that the Plan must recognise. | The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. |
| BLPIO-255 | IO Consultation Event - Bham Lib | | 13/12/22 14:49 | <ol style="list-style-type: none"> 1. Socio-economic inequalities between different areas in the city 2. Centralised services are difficult to access for those further away 3. Poor utilisation of council tax monies | <ol style="list-style-type: none"> 1. The plan recognises the structural inequalities and high levels of deprivation in certain parts of the city and seeks to ensure inclusive growth translating into greater opportunity and prosperity for all. 2. The plan will aim to create strong, vibrant and healthy communities with sufficient access to services and employment opportunities. The plan will also explore how the 15-20 minute neighbourhood concept can |

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| | | | | | <p>be applied or supported through the local plan to enable residents to access all of their needs within a 15 or 20 minute walk or bike ride from their home. This can help to reduce car use, encourage active travel and help to address the climate emergency, imbalances in access to services and facilities and improve the health and well-being of all residents.</p> <p>3. The utilisation of Council Tax monies is not a planning matter.</p> |
| BLPIO-324 | | Housebuilders Consortium (Barton Willmore) | 14/12/22 16:02 | <ol style="list-style-type: none"> 1. The Council should consider a Plan period that covers the twenty-year period from April 2022 to March 2042, applying Birmingham's Standard Method based LHN of 7,136 new homes per year throughout. 2. No adjustment to the LHN figures should be made for notional past over delivery in the circumstances. 3. Based on the analysis presented in the HEDNA, planned housing growth is not expected to act as a constrained on economic | <ol style="list-style-type: none"> 1. The Council's plan period indicates when work first started on the preparation of the Local Plan. As the HEDNA was commissioned in April 2021, the base date for data was 20/21. 2. Disagree, if over-delivery is not accounted for, this could result in over-supply. 3. It already becoming clear that the Birmingham Local Plan will be capacity-led, i.e. the plan will deliver what can physically be accommodated within the city. This is a continuation of the situation |

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| | | | | <p>growth. However, the transformative social and economic effects of delivering Birmingham's LHN in full have not been assessed.</p> <p>4. Birmingham's housing shortfall is a persistent and unresolved problem. A coordinated Strategic HMA approach is necessary and a statement of common ground should be completed.</p> <p>5. The paper misquotes affordable housing figures - 2,997 dwellings per annum need (affordable housing) whereas HEDNA estimates actual need to be 6,306 from 2020 to 2042.</p> <p>6. Recent housing delivery is evidently 'one bed home heavy'. Increasing the supply of housing land capable of delivering larger (e.g., family) homes is critical.</p> | <p>under the Birmingham Development Plan. The HEDNA considers that the continuation of past trends is the most appropriate economic projection due to the extremely different projections resulting from the labour demand and economic growth scenarios. In this way, the preferred economic growth scenario will support the amount of housing that can be accommodated in the city and vice versa. The comment assumes that the LHN can be met in full within the city, but the HELAA has demonstrated that this is not the case. It must also be noted however that the employment land need figure is a minimum requirement and so development above this figure will be supported and will be monitored over the plan period.</p> <p>4. The Council recognises the need for Birmingham to work co-operatively with other local authorities and bodies in the wider area to deal with issues that run across local authority boundaries. This joint working is critical for Birmingham as we are unlikely to be able to meet all of our development needs within our</p> |
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| | | | | | <p>boundary. Birmingham will need to continue to work effectively with neighbours to achieve a planned response to the issues, particularly in relation to housing shortfalls. A Statement(s) of Common Ground will be prepared.</p> <p>5. The Issues and Options Document clearly states that the figure of 2,997 affordable dwellings per annum excludes households already in accommodation.</p> <p>6. Agreed, one of the key aims of the Plan is to provide for a wide range of housing types, tenures and sizes.</p> |
| BLPIO-407 | Calthorpe Estates | | 29/12/22 12:55 | <p>The Calthorpe Estate (approx. 1600 acres one mile from the city centre) should be identified as one of the key geographical areas that can make a substantial contribution to driving forward the City's growth and should be captured in the list of sites.</p> | <p>The Edgbaston area which includes all of the Calthorpe Estate (and wider) has been identified as a Key Growth Area - Opportunity Area in para 9.7 of the Issues and Options Document. The Preferred Options Document will include draft 'Opportunity Area' policies and site allocations. The text suggested by Calthorpe Estates will be considered in the formulation of the policies.</p> |

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| BLPIO-464 | Mr James Chatterton | William Davis Ltd | 30/12/22 13:58 | There is development land within the city that can accommodate sustainable housing development. | Comment noted. |
| BLPIO-512 | | Midland Land Ltd | 04/01/23 09:22 | Predominance of apartment-led development and the lack of affordable housing delivery should also be identified as significant challenges. | The challenges of boosting affordable housing supply and providing for a range of house types, sizes and tenures that meets the city's identified needs have been articulated in the Issues and Options Document and are proposed as key objectives for the Plan to address. |
| BLPIO-536 | Mr David Joseph | Bloor Homes | 05/01/23 08:51 | Predominance of apartment-led development and the lack of affordable housing delivery should also be identified as significant challenges. | The challenges of boosting affordable housing supply and providing for a range of house types, sizes and tenures that meets the city's identified needs have been articulated in the Issues and Options Document and are proposed as key objectives for the Plan to address. |

Question 3 - Do you agree with the proposed vision?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-47 | Mr Mike Mounfield | Colmore BID | 21/11/22 15:53 | Yes | Noted |
| BLPIO-67 | Mr Chris Brammeier | Warwickshire County Council Lead Local Flood Authority | 28/11/22 10:26 | Yes | Noted |
| BLPIO-71 | Ms Karen Newman | BOM (Birmingham Open Media) | 28/11/22 12:18 | Protecting and celebrating our built and social heritage should be important in itself and not just related to new development. | Agree. Wording will be amended to draw out the distinction between protecting and enhancing the city's heritage and cultural assets and integrating new development with respect to them. |
| BLPIO-96 | The Tyler Parkes Partnership Ltd Gail Collins | West Midlands Police | 02/12/22 18:41 | The Chief Constable of West Midlands Police supports the Council's proposed vision. There is however no clear reference to reducing crime and the fear of crime, together with the associated infrastructure to facilitate that, or promoting design that discourages crime. | Objective 5 includes the creation of "safe, attractive and sustainable neighbourhoods". Objective 10 refers to the creation of "inclusive and safe environments". Detailed policy in relation to design and infrastructure will emerge as the Plan develops. |

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| BLPIO-140 | Mr John Pearce | Bloor Homes | 05/12/22 10:08 | Generally agree with proposed vision No particular preference in objective however welcome inclusion of high quality new housing and affordable homes in a variety of tenure etc | Support noted. |
| BLPIO-216 | IO Consultation Event - Yardley | | 08/12/22 11:26 | <ol style="list-style-type: none"> 1. Will the vision be delivered? 2. Important to seek many wide ranging opinions | <ol style="list-style-type: none"> 1. Delivery of the Plan will be monitored. 2. The Council has and will continue to seek a wide a range of opinions from different consultees and stakeholders on the development of the Local Plan. |
| BLPIO-298 | Mr Colin Griffiths | Satnam Group | 14/12/22 12:25 | Housing in existing communities is required - some which will be in the green belt. | Comment noted. |
| BLPIO-425 | Jon Morris | Acocks Green Focus Group | 29/12/22 15:38 | Support, but question how it will be achieved. | Support noted. We are still in the early stages of the plan-making process. As the Plan develops, a development strategy and detailed policies and site allocations will emerge. |
| BLPIO-465 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:01 | Agree with proposed vision. | Support noted. |

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| BLPIO-513 | | Midland Land Ltd | 04/01/23 09:34 | Broadly agree but the vision should be more locally specific, recognising the need to provide family housing beyond the city centre and for cross boundary working. | The vision is strategic and references the need to provide a wide choice of housing. The HEDNA demonstrates a need for all sizes of residential dwellings, not just family housing. The Plan will include a policy to ensure the right housing mix is delivered. The need for cross boundary working to address any housing and employment land shortfalls will be added to the objectives. |
| BLPIO-537 | Mr David Joseph | Bloor Homes | 05/01/23 09:00 | Broadly agree but the vision should be more locally specific, recognising the need to provide family housing beyond the city centre and for cross boundary working. | The objectives reflect the need to provide for a range of housing. The HEDNA demonstrates that all sizes of housing are required in the city. The need for cross boundary working with other authorities will be added to Objective 3 "City of growth." |
| BLPIO-23 | Mr Joshua James | Severn Trent Water | 09/11/22 12:24 | Severn Trent agree with the proposed vision stated in this document. | Support noted. |
| BLPIO-84 | Mr John Pearce | Bloor Homes | 01/12/22 12:12 | Generally agree with vision Don't consider that there are any objectives missing. | Support noted. |
| BLPIO-106 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 10:52 | Yes | Noted |

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| BLPIO-154 | Mrs Fiona Adams | The Moseley Society | 05/12/22 11:21 | Overambitious. Hard to see how objectives will be achieved. | Given the challenges faced by the city, the Council considers that it is appropriate to set an ambitious vision which will require a radical approach to deliver. |
| BLPIO-162 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 12:39 | Over ambitious - are the objectives achievable? | Given the challenges faced by the city, the Council considers that it is appropriate to set an ambitious vision which will require a radical approach to deliver. The objectives are priority actions to help achieve the vision and considered realistic. |
| BLPIO-262 | Unknown | Westside Business Improvement District | 13/12/22 15:35 | The Westside BID agrees with the city's vision. | Support noted. |
| BLPIO-393 | Mr Richard Forbes | Canal and Rivers Trust (Planning Manager) | 28/12/22 12:35 | The canal network can assist in delivering many of the sustainable goals in the Plan. | Comment noted. |
| BLPIO-435 | Imogen Forster | St Joseph Homes Limited | 30/12/22 09:23 | Supportive of the proposed vision. | Support noted. |
| BLPIO-459 | Emily Barker | Worcestershire County Council | 30/12/22 12:57 | Broadly support the vision. Would like to see "character" included in objectives 6 and 8. | Reference to character will be added to Objective 8. |

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| BLPIO-479 | Ms Anna Hulme | St. Modwen Properties Plc | 03/01/23 09:26 | Support the vision. Recommend that adjoining authorities such as Bromsgrove are encouraged to accommodate some of Birmingham's shortfall and this should include the encouragement to deliver major development sites such as Groveley Garden Village. | Comments noted. |
| BLPIO-495 | Craig Rowbottom | Arup | 03/01/23 14:22 | Partly | Noted |
| BLPIO-519 | | Druids Heath Consortium | 04/01/23 11:13 | Broadly agree but the vision should be more locally specific, recognising the need to provide family housing beyond the city centre and for cross boundary working. | The vision is strategic and references the need to provide a wide choice of housing. The HEDNA demonstrates a need for all sizes of residential dwellings, not just family housing. The Plan will include a policy to ensure the right housing mix is delivered. The need for cross boundary working to address any housing and employment land shortfalls will be added to the objectives. |
| BLPIO-15 | Janelle Kolas | | 04/11/22 09:42 | <ol style="list-style-type: none"> 1. Need a clear commitment to end littering and fly tipping 2. Investment in bulb planting along residential streets / meadows / roundabouts etc to commit to pollination | Comments are noted, although they do fall outside of the remit of the Local Plan. |

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| BLPIO-40 | Mr Stuart Morgans | Sport England | 18/11/22 09:17 | Sport England advocates that the Council recognises and references the inter linkages between many of these objectives. | Interlinkages between objectives will be recognised in the Plan. |
| BLPIO-119 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 20:59 | The vision should be unique to Birmingham | It is considered that the vision should be strategic. The development strategy and detailed policies will be specific to Birmingham. |
| BLPIO-131 | Mr David Carter | Tyler Parkes | 05/12/22 09:10 | The vision should be unique to Birmingham. | It is considered that the vision should be strategic. The development strategy and detailed policies will be specific to Birmingham. |
| BLPIO-147 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:47 | <ol style="list-style-type: none"> 1. City of Nature should be in top 3 position of the list 2. Fair access to green space should be included in the vision | <ol style="list-style-type: none"> 1. The objectives are not ordered in importance. 2. Agreed, wording will be added in the vision (under "a healthy city") in relation to fair access to open space |

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| BLPIO-251 | | West Midlands Housing Association Planning Consortium (WMHAPC) | 13/12/22 14:03 | The WMHAPC agrees with the Vision set out for Birmingham which includes the “offering of a choice of high quality affordable housing”. | Support noted. |
| BLPIO-259 | IO Consultation Event - Bham Lib | | 13/12/22 15:20 | The vision is unrealistic | Given the challenges faced by the city, the Council considers that it is appropriate to set an ambitious vision which will require a radical approach to deliver. |
| BLPIO-303 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:16 | Yes | Noted |
| BLPIO-444 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 11:10 | Agree with proposed vision. | Support noted. |
| BLPIO-472 | | Midlands Land Portfolio Ltd | 30/12/22 14:56 | Agree with proposed vision. | Support noted. |
| BLPIO-30 | Mrs Nuala Palmer | | 09/11/22 15:35 | <ol style="list-style-type: none"> 1. Net zero targets are unrealistic 2. Aspiration of green spaces for the City are undermined by charging to use local parks 3. Need to consider safety of pedestrianised places especially at night | <ol style="list-style-type: none"> 1. Delivering the changes that are needed will require major and rapid systems changes and have a significant financial cost. However, the cost of acting now needs to be weighed up against the cost of retrofitting at a later date and the additional cost of adapting to the |

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| | | | | <p>4. Public transport in the city is unreliable and unsafe</p> <p>5. HMOs are a real issue and goes against creating sustainable and attractive neighbourhoods</p> <p>6. You keep prioritising walking and public transport - this is not what many people want.</p> | <p>unavoidable impacts of climate change in the future. Aiming to create neighbourhoods where residents can access all their needs within a 15 or 20 minute walk or bike ride from their home will help to encourage active travel and address the climate emergency.</p> <p>2. The Birmingham Transport Plan 2031 outlines how the city's transport system needs to be transformed to meet the challenges and opportunities of the next decade including accommodating future growth. Managing demand through parking measures will be used as a way to reduce car travel through availability, pricing and restrictions, whilst improvements to public transport and active travel infrastructure will encourage mode shift from private car use.</p> <p>3. Active travel facilities are a key priority for Birmingham's Transport Plan (BTP) and are essential to delivering a sustainable well-connected city. Through public realm improvements as part of the BTP the Council aim to deliver new public</p> |
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| | | | | | <p>squares, parks, and wide, level, traffic-free boulevards, and to improve road crossings. The result will be a vibrant city environment, which will allow people to move safely and freely.</p> <p>4. Agree that public transport provision needs to be strengthened. There is good bus coverage in Birmingham, but journey times can be unpredictable and provision unequal across the city and at different times of the day. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes. Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone.</p> <p>5. The Council recognises that high concentrations of HMOs can be harmful to residential amenity and balanced communities and is committed to maintaining and creating thriving sustainable neighbourhoods. With this in mind, the City Council introduced a city-</p> |
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| | | | | | <p>wide Article 4 Direction in June 2020 followed by a stronger local planning policy on HMOs (DM11) in December 2021 and a detailed supplementary planning document on HMOs in April 2022. With these 3 tools in place, the Council will be able to better manage the growth of HMOs across the city.</p> <p>6. We cannot tackle the climate emergency without fundamental changes to the way people and goods move around our city. The climate emergency is setting the pace of change for our transport network. The latest evidence shows that a rapid shift is needed away from single occupancy private car use. The Birmingham Transport Plan sets out clear principles for unlocking the potential of transport. Walking and cycling are the healthiest ways to travel, either for entire local journeys or as part of longer trips involving other modes such as public transport. Places designed for walking and cycling are more inclusive for those on lower income who are unable to afford a private</p> |
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| | | | | | car, and for those who cannot drive due to age or disability. |
| BLPIO-56 | Ms Libby Harris | Birmingham Friends of the Earth | 23/11/22 17:07 | Welcome recognition that a green economy will serve to progress and deliver many of the objectives and should be the overarching guide to planning decisions. | Comment noted. |
| BLPIO-177 | Miss Helen Davies | Transport for West Midlands | 05/12/22 14:49 | Should include a bullet point about decarbonising the transport network, and the chapter on Connectivity could be further enhanced with respect to decarbonisation. | Objective 9 includes reference to the "delivery of an integrated and sustainable transport network which prioritises walking, cycling and public transport". The word decarbonised will also be added. The chapter on Connectivity will include more linkages to the decarbonisation objective. |
| BLPIO-317 | Paul Gilmour | Dale Farm | 14/12/22 15:44 | The use of maximised in the vision is an incorrect word choice. The words "as far as practicable" should be added to the end ("a resilient city that has prepared for the local impact that climate change will present and has maximised the local capacity for energy generation and storage) | It is considered that the word maximise is appropriate. The definition of 'maximise' (according to the Cambridge Dictionary) means to make something as great in amount, size or importance <i>as possible</i> . This definition takes into account what is possible/ working within constraints. |
| BLPIO-366 | Rosamund Worrall | Historic England | 21/12/22 12:55 | The vision omits reference to the historic environment and heritage | The vision will be amended to include heritage assets. |

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| | Unknown | | | assets - and their contribution to the city's future success. | |
| BLPIO-409 | Calthorpe Estates | | 29/12/22 14:02 | Agree with vision | Support noted. |
| BLPIO-434 | Becky Clarke | BCC Lead Local Flood authority | 30/12/22 08:53 | The Birmingham LLFA welcomes the 2024 vision and want the opportunity to support delivery of the relevant and related aspirations. | Support noted. |
| BLPIO-526 | Dr Peter Fawcett | Gladman Developments Ltd | 04/01/23 15:17 | Supportive of the proposed vision and objectives. Any policies arising from these need to be fully evidenced and must not make development and the whole plan unviable. Gladman will comment further at future consultation stages. | Support noted. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. |
| BLPIO-566 | IO Consultation Event - Ladywood | | 09/01/23 09:30 | Top priorities are waste, health, heritage, transport and energy efficiency. | Noted. |

Question 4 - Do you agree with the proposed vision?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-47 | Mr Mike Mounfield | Colmore BID | 21/11/22 15:53 | Yes | Noted |
| BLPIO-67 | Mr Chris Brammeier | Warwickshire County Council Lead Local Flood Authority | 28/11/22 10:26 | Stronger wording required with regards to Sustainable Drainage. The new Local Plan should seek to push the envelope, demanding high-quality, above-ground SuDS features that meet the multi-functional expectations of the latest NPPF and PPG. | Agree, the detailed policy on Sustainable Drainage will seek to ensure high quality above ground SUDs features which meet the multi-functional expectations of the latest NPPF and PPG. |
| BLPIO-96 | The Tyler Parkes Partnership Ltd Gail Collins | West Midlands Police | 02/12/22 18:41 | Reducing crime and the fear of crime, together with the associated infrastructure to facilitate that, and promoting design that discourages crime, should be a specific objective. | Objective 5 provides for the creation of "safe, attractive and sustainable neighbourhoods". Objective 10 refers to the creation of "inclusive and safe environments". Detailed policy in relation design and infrastructure will emerge as the Plan develops. |
| BLPIO-333 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:32 | Support overall objectives. Important that the proposals of the Local Plan are not predetermined by the non-statutory vision of the Our Future | The Local Plan will be based on appropriate evidence and prepared in accordance with the Council's Statement of Community Involvement and the relevant legislation and national policy and guidance. The Local Plan will not be predetermined by the non- |

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| | | | | City Plan (OFCP) - and are open to thorough processes and consultation. Ensure there is appropriate engagement with landowners and the public. | statutory OFCP Central Area Framework but consultation feedback provided on OFCP will be used as evidence to inform the Local Plan. |
| BLPIO-425 | Jon Morris | Acocks Green Focus Group | 29/12/22 15:38 | Support, but a radical new approach is required. | Support noted. We are still in the early stages of the plan-making process. As the Plan develops, a development strategy and detailed policies and site allocations will emerge. We recognise that the Plan will have to take a radical approach in order to achieve the objectives. |
| BLPIO-465 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:01 | Agree with 'A city of growth for all' and 'A city of thriving neighbourhoods' . | Support noted. |
| BLPIO-537 | Mr David Joseph | Bloor Homes | 05/01/23 09:00 | No comment | Noted |
| BLPIO-23 | Mr Joshua James | Severn Trent Water | 09/11/22 12:24 | The plan's objectives are ambitious and align with several Severn Trent's objectives | Support noted. |
| BLPIO-106 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 10:52 | Yes | Noted |

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| BLPIO-154 | Mrs Fiona Adams | The Moseley Society | 05/12/22 11:21 | The objectives are interlinked and underpinned by good housing. Not enough attention is given to renovating and improving the existing housing stock. | Wording will be added to recognise the interlinkages between the objectives. Detailed policy will be included to encourage the re-use of existing good quality housing stock. |
| BLPIO-162 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 12:39 | Ambition needs to be placed in a more realistic context. | Given the challenges faced by the city, the Council considers that it is appropriate to set an ambitious vision which will require a radical approach to deliver. The objectives are priority actions to help achieve the vision and considered realistic. |
| BLPIO-262 | Unknown | Westside Business Improvement District | 13/12/22 15:35 | <p>Generally the objectives are agreeable however some caution is advised as follows:</p> <ol style="list-style-type: none"> 1. Policies proposed to achieve net zero must be carefully devised to ensure they are not too onerous on developers and therefore act as a disincentive. 2. There is a need to invest in traditional skills around manufacturing to modernise the process (via green driven processes) | <ol style="list-style-type: none"> 1. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. 2. The objectives promote the green economy and the improvement of the education and skills of residents at a strategic level. We will explore whether and how the plan can contribute to the more specific suggestion of modernising traditional manufacturing skills at future stages of plan preparation. |

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| | | | | <p>3. There is a need to brighten and make safer the night time element of the city</p> <p>4. What is the city's intention for its massive agriculture holding outside and around the city. Could it be used for reforestation?</p> | <p>3. The Plan will consider how to enable and manage the evening and night-time economy. This could include considering whether to have a policy that seeks to protect public houses, theatres, live music venues and night clubs from change of use. We will also consider whether to have a policy which identifies where the clustering of night time economy uses would be encouraged and not encouraged to help promote intensification and diversification of leisure and cultural uses while protecting local amenity and character. Clustering of night-time economy uses would support provision of public transport, in particular evening services and timetables.</p> <p>4. The City's landholdings outside of the City Council are are not a matter for the Local Plan - any changes to the use of these landholdings would be a matter for the City Council's Property services and for consideration through the planning processes in the authorities within which they sit.</p> |
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| BLPIO-435 | Imogen Forster | St Joseph Homes Limited | 30/12/22 09:23 | Supportive of the proposed objectives. | Support noted. |
| BLPIO-479 | Ms Anna Hulme | St. Modwen Properties Plc | 03/01/23 09:26 | Broadly support but suggest that the objective to meet the housing needs of the city is amended to reflect that neighbouring authorities will need to pick up some of the housing shortfall. | The recognition that all of Birmingham's housing need cannot be fully met within the city and the need to work with neighbouring local authorities to meet the shortfall is referenced in the Plan. |
| BLPIO-495 | Craig Rowbottom | Arup | 03/01/23 14:22 | <ol style="list-style-type: none"> 1. Objective 1 – make this clearer given the wider commitment for the city to be net zero by 2030. Any delay in achieving this until 2042 should be resisted. 2. Objective 3 – more it could say about Birmingham as the hub of the West Midlands and a truly global city. There is the opportunity to capitalise on the Games and other major events 3. Objective 5 – The Council should, rather than saying "...they'll 'continue to enhance' it...", consider talking about addressing the future of the city centre head-on. | <ol style="list-style-type: none"> 1. Agree, text will be added to clarify. 2. Agree, wording will be added to Objective 3 in relation to strengthening Birmingham's status as a global city. 3. Agree, wording of Objective 5 will be amended to reflect Arup's comments in relation to the bullet about the City Centre. |
| BLPIO-547 | Mark Sullivan | CPRE Warwickshire | 05/01/23 12:09 | Objective 6 needs to be more specific about the standards of urban design | The Plan will contain policy relating to the conservation of historic buildings and good |

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| | | | | and the conservation of existing buildings and streets of good quality. | design. We are aware of potential forthcoming requirements for all local authorities to produce a Design Code for their whole area. Should this requirement be introduced, we intend to prepare a Design Code to sit alongside the Local Plan, as a separate document and we will publish a timetable for doing so. |
| BLPIO-40 | Mr Stuart Morgans | Sport England | 18/11/22 09:17 | Objectives should be recognised as being inter-connected and not mutually exclusive. | Interlinkages between objectives will be recognised in the Plan. |
| BLPIO-119 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 20:59 | Recognise the importance of sports at the Wheels site in contributing to Objective 6. | Comments are noted |
| BLPIO-131 | Mr David Carter | Tyler Parkes | 05/12/22 09:10 | 1. There is a need for a more sustainable and efficient public transport offer to facilitate a reduction in car ownership and usage through the provision of | Prioritising sustainable transport and reducing the need to travel is a key element of the Birmingham Transport Plan and the emerging Birmingham Local Plan will fully support this through land use policies that aim to increase density, support mixed land |

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| | | | | <p>frequent services across the city over longer hours (some 24/7).</p> <ol style="list-style-type: none"> 2. The 15-minute city concept has been omitted 3. The land at Fox Hill already has local shops at the Mitchells Centre and Chase Farm which could be expanded in support of any new residential development 4. The people-oriented objectives are most important | <p>uses and restrict car availability and use. The Birmingham Local Plan will also promote and prioritise sites with high levels of accessibility by sustainable modes. Agree people-oriented objectives are important and that public transport provision needs to be strengthened. There is good bus coverage in Birmingham, but journey times can be unpredictable and provision unequal across the city and at different times of the day. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes. The Council are also considering whether to have a policy which encourages the clustering of night-time economy uses. This could support the provision of public transport, in particular evening services and timetables. We are supporting Transport for West Midlands in their efforts to enhance local public transport services. We will continue to invest in public transport priority through road space reallocation.</p> |
| BLPIO-147 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:47 | <ol style="list-style-type: none"> 1. Reference to the Local Nature Recovery Strategy - which is critical to biodiversity of the city - should be referred to in the Plan. | <ol style="list-style-type: none"> 1. Agree, reference will be made to the Local Nature Recovery Strategy in the Local Plan. |

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| | | | | <ol style="list-style-type: none"> 2. Objective 8 should read 'To protect, enhance and extend our varied natural assets...' 3. Objective 9 could include integrating green/ blue infrastructure into sustainable transport solutions | <ol style="list-style-type: none"> 2. Agree to the wording suggested for bullet 1 of Objective 8. 3. Integration of green/ blue infrastructure into sustainable transport solutions will be considered for detailed policy. |
| BLPIO-303 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:16 | <ol style="list-style-type: none"> 1. Net zero city: policies proposed to achieve net zero must not be too onerous on developers as to cause a disincentive 2. Resilient City could be achieved with minimal cost to developers, a do-able objective. 3. City of growth for all: A proposed re-investment into Walmley Club from the sale of the Green Belt land would increase the chances of the Club's long term survival. The club is looking to serve the wider community and especially those with dementia 4. Thriving Neighbourhoods: The Club shares this objective. | <ol style="list-style-type: none"> 1. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. 2. Points 2 - 8 are noted. |

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| | | | | <p>5. City of Layers: The Club still has aspirations to become the country's first purpose-built dementia friendly golf facility</p> <p>6. Healthy City: The Clubs hares this objective; the sale of the land for development would allow investment back into the club to improve its facilities</p> <p>7. City of nature: The Club shares this objective.</p> | |
| BLPIO-351 | Patrick Jervis | Lichfield District Council | 20/12/22 17:26 | The Plan should recognise that the positive impacts of growth for the City may not always be perceived as such in neighbouring areas. | The impact on neighbouring authorities will be addressed through the Duty to Co-operate. The Council recognises the need for Birmingham to work co-operatively with other local authorities and bodies in the wider area to deal with issues that run across local authority boundaries. |
| BLPIO-444 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 11:10 | Agree with 'A city of growth for all' and 'A city of thriving neighbourhoods' . | Support noted. |
| BLPIO-472 | | Midlands Land Portfolio Ltd | 30/12/22 14:56 | Agree with 'A city of growth for all' and 'A city of thriving neighbourhoods' . | Support noted. |
| BLPIO-30 | Mrs Nuala Palmer | | 09/11/22 15:35 | 1. Prioritising public transport is unfair to those who require a motor vehicle and especially | 1. The Birmingham Transport Plan 2031 outlines how the city's transport system needs to be transformed to meet the |

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| | | | | <p>those who work outside of the city and wider region. The CAZ has further exacerbated the problem for many families.</p> <p>2. Unsafe city with blatant crime taking place.</p> | <p>challenges of the next decade. The Birmingham Local Plan recognises the value of good connectivity within and beyond the city boundary. Prioritising public transport will serve a greater portion of the population, encouraging those users who can switch modes from private car to public transport and active travel. As a result there will be less congestion and quicker journey times for those who require a motor vehicle, creating a sustainable transport network.</p> <p>We acknowledge that some people are unable to access key opportunities and services without their cars and are also struggling financially due to the costs of car ownership. We will take this into consideration when deciding the pricing structure of different parking measures as part of the Birmingham Transport Plan Delivery Plan, in order to mitigate any adverse impacts on those who already under economic pressure.</p> <p>Poor air quality remains a public health risk and the Clean Air Zone provided the city with an effective tool for tackling this issue in the shortest possible time. When the scheme was launched in 2021 if you lived in the zone you could apply for a two-year temporary exemption permit to give drivers</p> |
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| | | | | | <p>the ability of modify or purchase a compliant vehicle. Also if you were eligible for a worker exemption and owned your car since 10 September 2018, you could apply for the Scrappage and Travel Scheme to scrap your non-compliant car and receive £2,000 credit off the cost of a vehicle from Motorpoint or £2,000 credit through a Transport for West Midlands Swift card.</p> <p>2. Within the jurisdiction of planning, the Local Plan will aim to create safe environments which could help reduce the opportunities for crime and reduce the fear of crime.</p> |
| BLPIO-56 | Ms Libby Harris | Birmingham Friends of the Earth | 23/11/22 17:07 | Partly | Noted |
| BLPIO-221 | Chris Lowe | Push Bikes | 12/12/22 18:19 | Birmingham could benefit from the health boost given by active travel and prioritise cycling as a key element in the transport mix. | Active travel facilities are a key priority for Birmingham's Transport Plan and are essential to delivering a sustainable well-connected city. The Council will continue to develop cycle schemes and canal towpath improvements including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements and |

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| | | | | | <p>opportunities such as improving cycling security. As a way of prioritising active travel in local neighbourhoods, the Council will improve wayfinding and ensure connectivity with public transport hubs.</p> <p>Agree, text will be added to Objective 7 to reflect the comment.</p> |
| BLPIO-317 | Paul Gilmour | Dale Farm | 14/12/22 15:44 | With regards to objective 1, the use of the words “as possible” should be changed to “as practicable” | The Council does not consider that the Objective conflicts with national policy or the UN Sustainable Development Goals. |
| BLPIO-366 | Rosamund Worrall Unknown | Historic England | 21/12/22 12:55 | <ol style="list-style-type: none"> 1. The objectives are not always reflected or aligned in the draft Sustainability topics 2. ‘Heritage’ features as a bullet point in Objective 6 which seeks to integrate new development with respect. It is not clear how that would be quantified in order to measure it as an outcome. 3. In line with NPPF terminology it is recommended that ‘damaged’ be replaced by ‘harmed’ | <ol style="list-style-type: none"> 1. The SA framework will be reviewed to ensure all the Plan objectives are reflected in the SA. 2. The monitoring indicators will be developed and consulted on as the Plan progresses. 3. Agree, the SA will be amended to replace the word 'damage' with 'harm' in relation to this objective. 4. Agree, the 'Opportunities' section will be amended to include heritage assets. |

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| | | | | 4. Heritage should be seen as an opportunity as well as a challenge. | |
| <u>BLPIO-409</u> | Calthorpe Estates | | 29/12/22 14:02 | Opportunities exist across the Calthorpe Estate to support the Council in achieving their objectives, for example, through the provision of new homes and employment opportunities, and providing greater access to areas of open space. | Support noted. |
| <u>BLPIO-434</u> | Becky Clarke | BCC Lead Local Flood authority | 30/12/22 08:53 | Birmingham LLFA fully supports the objectives within this paper. | Support noted. |
| <u>BLPIO-526</u> | Dr Peter Fawcett | Gladman Developments Ltd | 04/01/23 15:17 | Yes | Noted |
| <u>BLPIO-583</u> | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:38 | Broadly correct objectives Economic growth needs to be inclusive and sustainable - otherwise it can further broaden inequalities Achieving the objectives in a holistic manner is important | Comments noted and reflected in the objectives. |

Question 5 & 6 - Is there anything missing from the vision and objectives?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-119 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 20:59 | Objective 6 is the most important and the Birmingham Wheels site is key in meeting it. People orientated objectives should be the next priority. | Comments noted. |
| BLPIO-131 | Mr David Carter | Tyler Parkes | 05/12/22 09:10 | The people-oriented objectives are most important i.e. 3, 5, 7 and 10. | Noted. |
| BLPIO-147 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:47 | Fair access to nature spaces should also be an objective and not just part of the vision | Objective 8 will be updated to include fair access to nature. |
| BLPIO-183 | Mr Peter Chambers | David Lock Associates on behalf of Birmingham Property Services | 05/12/22 15:18 | Co-operation with neighbouring authorities to meet wider development needs across the Housing Market Area should be acknowledged as a Strategic Objective. | Agree, under the Objective 'City of growth' and additional bullet will be added "To work with neighbouring authorities to address any housing an employment land shortfalls in the housing market area and to address |

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| | | | | | other strategic cross boundary planning matters." |
| BLPIO-259 | IO Consultation Event - Bham Lib | | 13/12/22 15:20 | <ol style="list-style-type: none"> 1. Investment and facilities in less prosperous areas of the city is needed 2. Investment in younger population linking with educational establishments 3. More joined up working across local authorities is required. | <ol style="list-style-type: none"> 1. Birmingham City Council is committed to invest in areas across the city and a key priority is the delivery of inclusive economic growth. 2. Birmingham has one of the youngest populations across cities in England and preparing our young people for future life and work is one the key priorities of the West Midlands' Regional Skills Plan. The Plan looks to improve the focus and impact of careers education and advice to young people - and have created a Youth Hub service as a result. Eight Youth Hubs have been set up across the region as part of the offer developed alongside with Jobcentre Plus, local authorities, the voluntary sector and local employers. The Hub looks to bring together key partners to join up local employment and training services, so that young people can gain the support they need in one place to access jobs and |

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| | | | | | <p>skills opportunities available to them.</p> <p>3. The City Council engages with neighbouring areas on a variety of issues including housing provision, transportation, employment land, minerals and waste management through a variety of working groups and partnerships.</p> |
| BLPIO-106 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 10:52 | All objectives are important | Noted. |
| BLPIO-154 | Mrs Fiona Adams | The Moseley Society | 05/12/22 11:21 | <ol style="list-style-type: none"> 1. How will the objectives be implemented? 2. How will the private sector be brought into harmony with the vision outlined? 3. Role of street trees (air pollution / lowering temperatures etc) should be emphasised. Their long term maintenance needs to be addressed. | <ol style="list-style-type: none"> 1. An Infrastructure Delivery Plan will be prepared to support the delivery of the Local Plan. 2. The private sector will be engaged throughout the preparation of the Plan. 3. Comments are noted. |
| BLPIO-162 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 12:39 | <ol style="list-style-type: none"> 1. Good quality, affordable housing underpins all objectives. The Plan however vastly favours new | <ol style="list-style-type: none"> 1. Detailed policy will be included to encourage the re-use of existing good quality housing stock. |

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| | | | | <p>developments rather than improving existing stock.</p> <p>2. Furthermore how could the private sector be more engaged to the City's vision.</p> | <p>2. The private sector have been consulted on the Issues and Options Document and will continue to play a key part of shaping the city's planning vision.</p> |
| BLPIO-262 | Unknown | Westside Business Improvement District | 13/12/22 15:35 | Realistic green policies within proposed developments and a policy for the city's land ownings outside of the City. | <p>1. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen.</p> <p>2. A local authority cannot have a policy or allocation for land outside of its boundary. This will have to be considered by the local authority where the land falls within.</p> |
| BLPIO-385 | Carl Mellor | Dudley Metropolitan Borough Council | 21/12/22 16:05 | <p>1. It is considered that Objective 3 'A city of growth for all' could be expanded upon to emphasise that the Council will seek to meet the housing and employment needs of the City within its own boundaries as far as possible.</p> <p>2. The visions and objectives could further recognise the</p> | <p>1. Under the Objective 'City of growth' an additional bullet will be added "To work with neighbouring authorities to accommodate any housing and employment land shortfalls."</p> <p>2. Comment noted. The plan objectives will be added to in order to reference the aim to work with neighbouring</p> |

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| | | | | <p>importance of connections with neighbouring authorities, especially with regards to connectivity and transport links between Birmingham and the Black Country / Dudley and green and blue infrastructure including walking and cycling recreational routes, and wildlife corridors.</p> | <p>authorities to address strategic cross boundary matters.</p> |
| <p>BLPIO-435</p> | <p>Imogen Forster</p> | <p>St Joseph Homes Limited</p> | <p>30/12/22 09:23</p> | <p>Supportive of all the plan objectives but those identified as preferences are the ones considered to have the highest importance.</p> | <p>Noted.</p> |
| <p>BLPIO-479</p> | <p>Ms Anna Hulme</p> | <p>St. Modwen Properties Plc</p> | <p>03/01/23 09:26</p> | <p>Include a new theme for a 'collaborative city' to ensure that Birmingham's housing and employment needs have been provided for in full across the wider region and that Birmingham continues to provide access to upper tier services and facilities consistent with its role as the regional economic hub to support the residents of the wider region.</p> | <p>Under the Objective 'City of growth' an additional bullet will be added "To work with neighbouring authorities to accommodate any housing and employment land shortfalls."</p> |
| <p>BLPIO-47</p> | <p>Mr Mike Mounfield</p> | <p>Colmore BID</p> | <p>21/11/22 15:53</p> | <p>Nothing Missing from Objectives.</p> | <p>Noted.</p> |

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| <p>BLPIO-96</p> | <p>The Tyler Parkes Partnership Ltd Gail Collins</p> | <p>West Midlands Police</p> | <p>02/12/22 18:41</p> | <ol style="list-style-type: none"> 1. Contributions will be required through CIL/ S.106 agreements to help fund the provision and maintenance of Police services. 2. The lack of specific reference in the vision and objectives to reducing crime and the fear of crime is a key omission. | <ol style="list-style-type: none"> 1. We will continue to work with West Midlands Police regarding policies securing the safety of residents, visitors and businesses within Birmingham. 2. Objective 5 provides for the creation of "safe, attractive and sustainable neighbourhoods". Objective 10 refers to the creation of "inclusive and safe environments". Detailed policy in relation design and infrastructure will emerge as the Plan develops. |
| <p>BLPIO-280</p> | <p>IO Consultation Event - Moseley</p> | | <p>13/12/22 16:31</p> | <ol style="list-style-type: none"> 1. Youth Forward should be engaged in future consultations 2. Services across the city need to be more joined up e.g. tree planting and cycle lanes need to be planned across entire areas, not just on a site by site basis. 3. Need a greater sense of strategic priorities for the city. 4. More partnership working, e.g. with TfWM, is required. 5. Better engagement with faith communities | <ol style="list-style-type: none"> 1. Noted. Birmingham Youth City Board will be added to the consultation database. 2. The Council's Corporate Plan 2022-2026 recognises that our services need to be reliable and joined up around residents' needs. 3. The Council's strategic priorities are clearly set out in the Corporate Plan 2022-2025. 4. The Council recognises that it can only achieve the Council's ambitions through working in partnerships with citizens, communities, and strategic |

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| | | | | 6. Need achievable objectives | <p>partners including Transport for the West Midlands.</p> <p>5. We will also continue to work with our diverse partners including the community and voluntary sector, faith and cultural sectors, academic and commercial sectors, NHS, police, regional partners (including the West Midlands Combined Authority) and many others.</p> <p>6. The proposed Local Plan objectives are considered to be ambitious but achievable.</p> |
| BLPIO-465 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:01 | The plan period should be extended to cover at least 30 years if it is determined that a new urban extension is required. | The plan period does not necessarily have to be extended to accommodate an urban extension. For example, Langley Sustainable Urban Extension was allocated for 6,000 homes in the adopted Birmingham Development Plan with recognition that approximately 5,000 would be delivered within the plan period. |
| BLPIO-495 | Craig Rowbottom | Arup | 03/01/23 14:22 | Is there merit in having a social value policy in the plan? Organisations working with the Council make a similar commitment to elements of social value through the Birmingham Business Charter for Social Responsibility. | The inclusion of a social value policy in the Local Plan will be considered. |

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| | | | | Placing a requirement on all developments to contribute in this way would help to achieve long term positive change for Birmingham. | |
| BLPIO-519 | | Druids Heath Consortium | 04/01/23 11:13 | <ol style="list-style-type: none"> 1. Strengthen objective 3 by expanding on the bullet point to 'meet the housing needs of the city' by adding that this will be met in full, including type, size and tenure of housing needed. The latter part of this bullet point about 'protecting the things that are important to existing communities' should be separated out. 2. A policy mechanism which sets out the need to work across boundaries within the HMA should be a key objective of the Plan. | <ol style="list-style-type: none"> 1. Bullet point 3 of Objective 3 will be amended to state "To meet the varied housing needs of the city while maintaining sustainable, mixed and balanced communities" 2. An additional bullet point will be included "To work with neighbouring authorities to address any housing and employment land shortfalls in the housing market area and to address other strategic cross boundary planning matters." |
| BLPIO-513 | | Midland Land Ltd | 04/01/23 09:34 | <ol style="list-style-type: none"> 1. Strengthen objective 3 by expanding on the bullet point to 'meet the housing needs of the city' by adding that this will be met in full, including type, size and tenure of housing needed. The latter part of this bullet point about 'protecting the things that | <ol style="list-style-type: none"> 1. Bullet point 3 of Objective 3 will be amended to state "To meet the varied housing needs of the city while maintaining sustainable, mixed and balanced communities" 2. An additional bullet point will be included "To work with neighbouring |

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| | | | | <p>are important to existing communities' should be separated out.</p> <p>2. A policy mechanism which sets out the need to work across boundaries within the HMA should be a key objective of the Plan.</p> | <p>authorities to address any housing and employment land shortfalls in the housing market area and to address other strategic cross boundary planning matters."</p> |
| <p>BLPIO-537</p> | <p>Mr David Joseph</p> | <p>Bloor Homes</p> | <p>05/01/23 09:00</p> | <p>1. Strengthen objective 3 by expanding on the bullet point to 'meet the housing needs of the city' by adding that this will be met in full, including type, size and tenure of housing needed. The latter part of this bullet point about 'protecting the things that are important to existing communities' should be separated out.</p> <p>2. A policy mechanism which sets out the need to work across boundaries within the HMA should be a key objective of the Plan.</p> | <p>1. Bullet point 3 of Objective 3 will be amended to state "To meet the varied housing needs of the city while maintaining sustainable, mixed and balanced communities"</p> <p>2. Comment noted. The need for cross boundary working with other authorities will be added to Objective 3 "City of growth."</p> |
| <p>BLPIO-444</p> | <p>Unknown</p> | <p>Taylor Wimpey (North Midlands)</p> | <p>30/12/22 11:10</p> | <p>The plan period should be extended to cover at least 30 years if it is determined that a new urban extension is required.</p> | <p>The plan period does not necessarily have to be extended to accommodate an urban extension. For example, Langley</p> |

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| | | | | | Sustainable Urban Extension was allocated for 6,000 homes in the adopted Birmingham Development Plan with recognition that approximately 5,000 would be delivered within the plan period. |
| BLPIO-472 | | Midlands Land Portfolio Ltd | 30/12/22 14:56 | The plan period should be extended to cover at least 30 years if it is determined that a new urban extension is required. | The plan period does not necessarily have to be extended to accommodate an urban extension. For example, Langley Sustainable Urban Extension was allocated for 6,000 homes in the adopted Birmingham Development Plan with recognition that approximately 5,000 would be delivered within the plan period. |
| BLPIO-30 | Mrs Nuala Palmer | | 09/11/22 15:35 | <ol style="list-style-type: none"> 1. Penalties for criminals 2. Reliable services - doctors, schools, transport 3. Reward hard work | The comments raised by the respondent are not within the gift of the planning system to deliver. |
| BLPIO-317 | Paul Gilmour | Dale Farm | 14/12/22 15:44 | No | Noted |
| BLPIO-366 | Rosamund Worrall Unknown | Historic England | 21/12/22 12:55 | Recommend that historic environment related opportunities are explored further before the next iteration of the Plan. | Agree, wording will be added to Objective 1 to encourage re-use of existing buildings. |

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| | | | | For example, Objective 1: A net zero carbon city makes reference to new development only. There is no reference to repurposing existing historic fabric to capture its embodied carbon and we consider this to be an omission. | |
| BLPIO-409 | Calthorpe Estates | | 29/12/22 14:02 | Importance of deliverability is fundamental in achieving the Plan's objectives. Plans need to be agile in adjusting to external market conditions (ie rising construction costs) | The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. |
| BLPIO-566 | IO Consultation Event - Ladywood | | 09/01/23 09:30 | Heritage assets should be given higher priority. | One of the key plan objectives is protect and enhance the city's rich heritage assets. |
| BLPIO-583 | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:38 | Objective 6 could be strengthened by also ensuring that neighbourhoods are also centred on public transport hubs and corridors. | The respondent's point is covered by objective 5 'city of thriving neighbourhoods'. |

Question 7 - Are there any additional housing growth options that we should consider?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-16 | Janelle Kolas | | 04/11/22 09:46 | Regulate where students are housed and keep them out of family homes and return current HMOs to family use. | The Council cannot mandate where students live but the Local Plan can guide where new purpose built student accommodation should be located and manage the growth and distribution of new HMOs. The Council cannot require that existing HMOs be returned to family use, but the provision of purpose built student accommodation could help to alleviate pressure on private rental housing and reduce the risk of family housing being converted to HMOs in areas of the city such as Selly Oak. |
| BLPIO-41 | Mr Stuart Morgans | Sport England | 18/11/22 09:21 | Object to Option 4 where this would result in the loss of any facilities for sport and physical activity | Comment noted. |
| BLPIO-128 | Mr Robert Adey | | 04/12/22 21:23 | Need more housing to prevent people moving out and travelling further to work etc | The Plan will seek to deliver housing growth to meet the city's varied housing needs which will help to retain the economically active in the city. |

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| <p>BLPIO-132</p> | <p>Mr David Carter</p> | <p>Tyler Parkes</p> | <p>05/12/22 09:30</p> | <p>Strongly support the use of the standard method for calculating the extent of housing need and BCC should accommodate as much of its housing requirement within its boundary as is reasonably practicable. Requires a combination of the options put forward. Higher densities should remain in City Centre as well as in close proximity to public transport nodes. Land west of the M6(T), north of Tamworth Road, east of Weeford Road and south of Slade Road is the most suitable location in landscape and green belt terms for release. Argues that the development of this site would not affect, or be affected by, the Langley SUE.</p> | <p>Comments noted.</p> |
| <p>BLPIO-156</p> | <p>Mrs Fiona Adams</p> | <p>The Moseley Society</p> | <p>05/12/22 11:35</p> | <p>All the options have a role to play. Green Belt should be an absolutely last resort.</p> | <p>Comment noted.</p> |
| <p>BLPIO-164</p> | <p>Professor Jean Gilkison</p> | <p>Moseley Regeneration Group</p> | <p>05/12/22 12:46</p> | <p>Can Birmingham realistically sustain proposed levels of growth in terms of overall infrastructure, provision of public amenity, housing, transport, and the wellbeing of citizens.</p> | <p>Growth will need to be supported by the necessary infrastructure to create sustainable places.</p> |

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| BLPIO-247 | IO Consultation Event - Bham Lib | | 13/12/22 13:36 | Widen out duty to cooperate discussions with authorities outside the HMA. | The Council recognises the need for Birmingham to work co-operatively with other local authorities and bodies in the wider area to deal with issues that run across local authority boundaries. Discussions are ongoing across the HMA and the wider region. |
| BLPIO-264 | Unknown | Westside Business Improvement District | 13/12/22 15:42 | BID supports all of the identified options for growth. Potential to allow high rise building not just on main arterial but on secondary roads through a sustainable municipal delivery model e.g. Castle Vale Community Housing Association and Westside BID. | Comments noted. |
| BLPIO-304 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:25 | Supports all of the identified options for growth. The Club can make a contribution towards option 6 –release of Green Belt through release of its 2 ha site at Brooks Road for family housing and retirement provision. | Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-352 | Patrick Jervis | Lichfield District Council | 20/12/22 17:27 | A major focus for new housing is on Green Belt (GB) release (Option 6 above). But the drawback is given in part as the sustainability impacts of travel into Birmingham from more distant areas and the potential difficulties of achieving the | Comments noted. |

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| | | | | BCC visions for the area. These aspects should be given more careful consideration by BCC. | |
| BLPIO-357 | Mike Dunphy | Bromsgrove District Council | 21/12/22 11:34 | <ol style="list-style-type: none"> 1. BDC and RBC welcome decision of BCC to adopt standard method for identifying housing need. 2. Support approach of BCC to continue to further investigate the supply available in Birmingham's boundary. 3. Support the 6 options for housing growth identified. All options are needed. 4. Bromsgrove and Redditch expect BCC to review and release Green Belt within its own boundaries at same time as expecting other local authority areas to review and release Green Belt land. Disappointed that BCC has yet to make a firm commitment to a Green Belt review at this early stage. It would be premature for BDC or RBC to commit to any contribution to Birmingham's housing shortfall at this stage. | <ol style="list-style-type: none"> 1. Support noted. 2. Support noted. 3. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. 4. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |

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| <p>BLPIO-408</p> | <p>Dr Peter King</p> | <p>CPRE Worcestershire</p> | <p>29/12/22 13:32</p> | <p>The housing target is too high and there is a case to depart from the standard method. Support all options that involve the intensification of land in the urban area. Development on open space needs to be carefully considered so that only the poorest open spaces are developed. Strongly oppose the release of Green Belt land.</p> | <p>The government expects the standard method to be used as the starting point for Local Plans and only in exceptional circumstances can a different approach be taken. As a sensitivity the Housing and Economic</p> <p>Needs Assessment (HEDNA) has explored housing need if the more recent 2018-based household projections were relied upon. This scenario resulted in an annual requirement of 6,140 new homes to be delivered in the city. (See Footnote 1). However, the assumptions that underpin this scenario would diverge from the Planning Practice</p> <p>Guidance and would also result in higher needs for other local authorities within the Greater Birmingham and Black Country Housing Market Area. For this reason, the City Council did not pursue this scenario and are continuing to follow the government's standard method.</p> |
| <p>BLPIO-473</p> | | <p>Midlands Land Portfolio Ltd</p> | <p>30/12/22 15:00</p> | <p>Green Belt release should not be seen the last resort option once all other options have been exhausted and should be</p> | <p>Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt</p> |

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| | | | | considered at the same time as the other options instead. Other authorities in the HMA will not have the capacity to meet all of the unmet needs. | release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document |
| BLPIO-505 | Dr Peter Fawcett | Gladman Developments Ltd | 03/01/23 16:21 | Need robust strategy for ensuring shortfall is met in full within the plan period before the plan is adopted including agreement across the HMA. | Birmingham City Council will continue to actively work with other local authorities in the HMA to address housing shortfalls arising in the HMA. |
| BLPIO-509 | Unknown | Taylor Wimpey (North Midlands) | 03/01/23 16:40 | Need robust strategy for ensuring shortfall is met in full within the plan period before the plan is adopted including agreement across the HMA. | Birmingham City Council will continue to actively work with other local authorities in the HMA to address housing shortfalls arising in the HMA. |
| BLPIO-529 | | MEPC Limited | 04/01/23 16:11 | Supportive of the housing growth options to maximise the use of brownfield land in urban areas and through appropriate densification. N.B. - the representation as submitted has been split up slightly as it jumps around between different questions. Appropriate text has been copied over to each question but this might mean that they appear slightly disjointed. | Comments noted. |

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| <p>BLPIO-545</p> | <p>Mark Sullivan</p> | <p>CPRE Warwickshire</p> | <p>05/01/23 11:58</p> | <ol style="list-style-type: none"> 1. Alternative scenarios to the government's standard should have been presented as options, including the alternative scenario in the HEDNA. 2. There should be no Green Belt release. | <ol style="list-style-type: none"> 1. The government expects the standard method to be used as the starting point for Local Plans, only in exceptional circumstances can a different approach be taken. The Housing and Economic Development Needs Assessment April 2022) considered that there may be exceptional circumstances in Birmingham that would point to a move away from the Standard Method. However, any lowering of the housing need number for Birmingham would have a converse increase in the other local authorities in the HMA if the need is assessed consistently. For this reason, the City Council did not pursue this scenario and are continuing to follow the government's standard method. 2. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set |
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| | | | | | out in the Preferred Options Document. |
| BLPIO-573 | IO Consultation Event - Stirchley | | 09/01/23 12:01 | Brownfield should always be considered first | The use of brownfield land has and will continue to be a key part of Birmingham's development strategy. |
| BLPIO-31 | Mrs Nuala Palmer | | 09/11/22 16:01 | <ol style="list-style-type: none"> 1. Too many HMOs. Issue of housing migrants in hotels needs sorting. 2. No building on playing fields and open space. | <ol style="list-style-type: none"> 1. The Council recognises that high concentrations of HMOs can be harmful to residential amenity and balanced communities and is committed to maintaining and creating thriving sustainable neighbourhoods. With this in mind, the City Council introduced a city-wide Article 4 Direction in relation to change of use from C3 dwellings to C4 HMOs in June 2020 followed by a stronger local planning policy on HMOs (DM11) through the Development Management in Birmingham Document December 2021 and a Supplementary Planning Document on HMOs in April 2022. With these three tools in place, the Council will be able to |

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| | | | | | <p>better manage the growth of HMOs across the city.</p> <p>2. The Council acknowledges the importance of protecting and playing fields and open space and will be cognisant of this when preparing policies and site allocations in the Local Plan.</p> |
| BLPIO-94 | Philippa Kreuser | | 02/12/22 15:58 | Green Belt boundaries should be reviewed to enable the development of sites for sustainable housing development, such as the land being promoted. | Comment noted. The strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-195 | IO Consultation Event - Sutton Cold | | 05/12/22 16:52 | <ol style="list-style-type: none"> 1. CPO undeveloped sites. 2. Build on brownfield. Use former disused pubs for new homes 3. Apartment living, many people don't want traditional housing. | <ol style="list-style-type: none"> 1. Birmingham has long been using CPO powers to deliver urban regeneration and leverage improvements to housing stock. This has included acquisitions relating to the Comprehensive Renewal Areas and significant clearance and redevelopment of many of the inner-city areas. Over the last 30 years, however, compulsory purchase activity has taken a more focussed approach to secure mainly economic |

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| | | | | | <p>regeneration of the city centre and local centres and more localised housing and economic regeneration. In addition, over 30 CPOs have been made to bring empty residential property back into beneficial use as part of the Empty Homes Strategy. The Council will continue to assess opportunities to acquire land and underused or redundant sites that have future development potential.</p> <p>2. The use of brownfield land has and will continue to be a key part of Birmingham’s development strategy.</p> <p>3. The Council’s latest Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes and types of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures is delivered to meet the housing needs of the city.</p> |
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| <p>BLPIO-254</p> | | <p>West Midlands Housing Association Planning Consortium (WMHAPC)</p> | <p>13/12/22 14:47</p> | <ol style="list-style-type: none"> 1. The standard method does not account for changing economic/demographic circumstances that may require the Council to set a higher housing target than the standard method indicates. 2. Support a combination of options for housing growth but need to consider the impact of a brownfield led approach on the delivery of affordable homes. Option 5 (Utilise some employment land for housing) is “likely to require land remediation and demolition ”which may have a negative impact on the viability of affordable housing provision at these sites. 3. Consider use of rural exception sites within released areas of Birmingham’s Green Belt. | <ol style="list-style-type: none"> 1. The Housing and Economic Development Needs Assessment (April 2022) estimated the need for affordable housing over the plan period. The HEDNA considered that this would not point to a need for the Council to increase the Local Plan housing requirement above that suggested by the Standard Method. 2. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. 3. Comment noted. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| <p>BLPIO-310</p> | | <p>Olympian</p> | <p>14/12/22 15:19</p> | <p>Supports higher housing densities on brownfield sites in particular e.g. Broad</p> | <p>Comment noted.</p> |

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| | | | | Street area. 224 Broad Street in Birmingham submitted and provides an excellent opportunity to provide high-density sustainable housing. | |
| BLPIO-318 | Paul Gilmour | Dale Farm | 14/12/22 15:46 | Need more sites that are suitable for family houses rather than flats and apartments. | The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. |
| BLPIO-367 | Rosamund Worrall Unknown | Historic England | 21/12/22 12:58 | Historic England would be seeking an approach which considers any harm to the significance of heritage assets, or their setting, and including unknown buried archaeology in line with NPPF requirements. | The Plan will seek to protect and enhance the city's character, rich heritage and cultural assets, and to integrate new development with respect to them. |
| BLPIO-402 | Vita Group | Vita Group | 29/12/22 09:44 | Supportive of 400 average dpa in the City Centre and should be a minimum figure so as not to discourage higher densities. | Support noted. |
| BLPIO-447 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 11:27 | Green Belt release should not be seen as the last resort option once all other options have been exhausted and should be considered at the same time as the other | Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. |

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| | | | | options instead. Other authorities in the HMA will not have the capacity to meet all of the unmet needs. | The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-455 | Ben Simm | National Highways | 30/12/22 12:41 | Locations which have good active and public transport infrastructure links should be identified first to enable residents to have modal travel choices to reduce journeys and assist against climate change. | The Plan will seek to ensure housing growth is sustainably located with access to good active travel choices and public transport infrastructure. |
| BLPIO-483 | | MKF Investments | 03/01/23 11:32 | A combination of options will be needed but particularly support the development of poor quality and under utilised open space. | Comment noted. Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-491 | | University of Birmingham | 03/01/23 13:24 | <ol style="list-style-type: none"> 1. Do not support option 4. The evidence in the Open Space Assessment and the Sustainability Appraisal do not support this option. 2. Some support for option 5 but only where it is poor quality and non-conforming employment land and not at the expense of providing sufficient employment land in the city. Also ensure that housing is not delivered in predominantly employment areas which may | <ol style="list-style-type: none"> 1. Comment noted. The Plan will seek to protect and increase the provision of public open space. However, there may be instances where an open space is underused because it has inherent problems and redevelopment of part of the open space could deliver significant improvements to the quality and recreational value of the remaining area. 2. Comments noted and agreed with. The Plan will seek to |

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| | | | | <p>result in compromised environments for residents.</p> <ol style="list-style-type: none"> 3. Agree that Option 6 should only be taken forward if all other options are exhausted. However, it is clear that that exceptional circumstances exist due to the large shortfall of housing development land. 4. If shortfall is to be met by other authorities, it should be located as close to Birmingham as possible. | <p>ensure a sufficient supply of employment land to meet the need over the plan period is accommodated and that high quality living environments are created.</p> <ol style="list-style-type: none"> 3. Comment relating to Option 6 is noted, however all evidence needs to be examined before that conclusion is drawn. 4. Birmingham City Council will continue to actively work with other local authorities in the HMA to address housing shortfalls arising in the HMA. |
| BLPIO-503 | | St. Philips Land | 03/01/23 15:05 | <ol style="list-style-type: none"> 1. Support the Council's decision to use the Standard Method and the Council's acknowledgement that additional options for housing growth must be considered to address the shortfall. 2. Do not support use of the the BDP housing requirement for the first 2-years of the plan period as it was artificially lowered to account for the Council not being able to fully meet its housing needs and constrains delivery | <ol style="list-style-type: none"> 1. Support noted. 2. The base date for the Birmingham Plan is 2020 - this overlaps with the period before the BDP became 5 years old and therefore, the housing target in the BDP was not considered out of date at this time and is still considered to be a valid basis for that period. Birmingham City Council will continue to actively work with neighbouring local authorities to address any |

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| | | | | <p>further into another plan period. The Council's LHN should be applied to the whole emerging plan period (2020-2042). If the LHN is applied to the emerging Plan period (2020-2042) this equates to a <u>minimum</u> LHN figure of c. 156,992 dwellings.</p> <ol style="list-style-type: none"> 3. St Philips recommends that the Council adopts a model such as Lichfields' 'The Black Country's next top model' when deciding how to distribute the unmet housing need between the GBBCHMA and beyond. 4. Agree with strategy to redevelop brownfield land but Option 6 Releasing Green Belt should be included within the combination of strategies for achieving housing growth and a Green Belt Review should be completed by the Council. 5. The strategic release of Green Belt should be completed in a sustainable manner so that potential negative effects can be minimised. St Philips recommends that a range of sites should be | <p>housing shortfalls in the HMA. Birmingham is part of the GBBCHMA Development Needs Group - Officer Working Group, which provides a framework for co-ordination between local authorities to ensure that unmet needs within the HMA can be satisfactorily addressed where possible.</p> <ol style="list-style-type: none"> 3. As above. 4. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. 5. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
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| | | | | assessed in terms of their suitability for residential development. | |
| BLPIO-507 | | Harworth | 03/01/23 16:39 | Need robust strategy for ensuring shortfall is met in full within the plan period before the plan is adopted including agreement across the HMA. Important that the authorities are not solely reliant on an updated Growth Study to inform any distribution. Consideration of factors such as commuting patterns and functional relationships is also critical. | Birmingham City Council will continue to actively work with other local authorities in the HMA to address housing shortfalls arising in the HMA. |
| BLPIO-511 | | Wain Estates | 03/01/23 16:42 | Need robust strategy for ensuring shortfall is met in full within the plan period before the plan is adopted including agreement across the HMA. | Birmingham City Council will continue to actively work with other local authorities in the HMA to address housing shortfalls arising in the HMA. |
| BLPIO-527 | Dr Peter Fawcett | Gladman Developments Ltd | 04/01/23 15:20 | <ol style="list-style-type: none"> 1. All six options should be pursued, including both greenfield and brownfield land and land in the Green Belt. 2. Any needs that cannot be met within the city need to be accommodated by other authorities in the HMA. | <ol style="list-style-type: none"> 1. Comments are noted 2. Birmingham City Council will continue to actively work with other local authorities in the HMA to address housing shortfalls arising in the HMA. |
| BLPIO-567 | IO Consultation | | 09/01/23 09:33 | There is a need for a new strategic green belt review | Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt |

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| | Event - Ladywood | | | | release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-585 | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:45 | <ol style="list-style-type: none"> 1. Support even higher densities than proposed along with 15-minute neighbourhoods. 2. City could consider innovative land value capture mechanisms to part-fund the step change in public transport that is required. 3. Use of 'incidental' open space supported, such as left-over land at the end of blocks of housing, unused garage courts but not other open space. 4. Need more mixed commercial / residential areas. 5. Oppose release of green belt. | <ol style="list-style-type: none"> 1. In line with national policy, the Local Plan will seek to optimise densities on housing sites to make better use of land in line with national policy while ensuring that high quality living environments are created and the full range of identified housing needs are met. We will be undertaking a review of more recently completed and consented development to help inform any proposed policy on minimum residential densities. The delivery of a 15 minute neighbourhood concept will be explored through the Plan. 2. Comment noted. 3. Comment noted. 4. The Plan will promote a mix of uses in suitable locations. 5. Comment noted. |

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| BLPIO-89 | Mr Thomas Ashley | Steenvlinder UK | 02/12/22 12:17 | Our preferred option comprises a combination of Option 2, Option 4, and Option 5. We consider that these options are required to ensure the use of brownfield land is maximised. Given the City's acute housing needs we are supportive of much greater flexibility to allow the re-use of undesignated employment land for residential development. | Comment noted. |
| BLPIO-93 | Mr John Pearce | Bloor Homes | 02/12/22 15:34 | All six options should be pursued but even then there will be a shortfall which should be accommodated in other authorities across the HMA. Agreement on how much of the shortfall each authority will take needs to be formalised in an Memorandum of Understanding. | Birmingham City Council will continue to actively work with neighbouring local authorities to address any housing shortfalls in the HMA. Birmingham is part of the GBBCHMA Development Needs Group - Officer Working Group, which provides a framework for co-ordination between local authorities to ensure that unmet needs within the HMA can be satisfactorily addressed where possible. |
| BLPIO-97 | The Tyler Parkes Partnership Ltd Gail | West Midlands Police | 02/12/22 18:46 | No mention of Police infrastructure to serve the large number of homes or the importance of Secured by Design, infrastructure and resources to support it. | The Plan recognises the need to create healthy, inclusive and safe places. Policy on design and infrastructure will be included in the Plan. |

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| | Collins | | | | |
| BLPIO-121 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 21:07 | Concerned that 'evicting' users at Birmingham Wheels Park demonstrates poor judgement about the importance of the sports and recreation facilities on the site. Open space is highly valued. Loss of employment land elsewhere is causing shortages which leads to pressure for new sites elsewhere e.g. Birmingham Wheels | Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-141 | Mr John Pearce | Bloor Homes | 05/12/22 10:09 | <ol style="list-style-type: none"> 1. Fully support Option 6 – Release of Green Belt but on its own will not be sufficient to address the shortfall. 2. Shortfall will only be met by other LAs in the HMA agreeing to take appropriate proportions through a signed Memorandum of Understanding. Should not be same approach as last time i.e. Policy TP48. 3. Promoting land at Frankley. | <ol style="list-style-type: none"> 1. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. 2. Birmingham City Council will continue to actively work with neighbouring local authorities to address any housing shortfalls in the HMA. |

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| | | | | | 3. Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-181 | Mr Peter Chambers | David Lock Associates on behalf of Birmingham Property Services | 05/12/22 15:17 | Co-operation is required with other authorities in the HMA to meet the development needs of the area. In particular, land at Frankley and Maypole present significant growth opportunities. | Birmingham City Council will continue to actively work with neighbouring local authorities to address any housing shortfalls in the HMA. |
| BLPIO-185 | Zaza Cooper | Mondelez International | 05/12/22 16:01 | Agree that a combination of these options would be most sustainable. Supportive of Option 4 to utilise poor under-used open space for housing. Our client controls an area of under-utilised open space at Bourneville that cannot be made publicly accessible. | Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-193 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 16:46 | <ol style="list-style-type: none"> 1. Oppose option 6, the loss of Green Belt until all other brownfield options are exhausted including use of empty and underused homes. 2. Maximum reduction of carbon emissions should be the guiding principle. | <ol style="list-style-type: none"> 1. Comment noted. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. 2. The Plan seeks to achieve a net zero carbon city by 2030. |

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| BLPIO-281 | IO Consultation Event - Moseley | | 13/12/22 16:38 | Alcester Road and Gideon Gardens/Moor Green Road could accommodate new housing. | Thank you for these site suggestions. These will be assessed in terms of their suitability, availability and achievability for housing development. |
| BLPIO-299 | Mr Colin Griffiths | Satnam Group | 14/12/22 12:26 | Option 6 is the correct strategy. | Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-309 | Mr Graham Turner | Friends Of Hill Hook Local Nature Reserve | 14/12/22 15:10 | Importance of protecting nature designations to acknowledge the benefits to both Birmingham's natural environment and the community that use them. | The statement attempts to acknowledge their importance. |
| BLPIO-330 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:22 | <ol style="list-style-type: none"> 1. Need balanced approach to ensure affordable housing delivery on and offsite and not skewed towards owner occupation i.e. flexible to support a wide variety of housing types. 2. Need to maximise use of brownfield sites and use CPOs and land assembly to deliver development. | <ol style="list-style-type: none"> 1. The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. It is acknowledged that |

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| | | | | | <p>policies will need to be sufficiently flexible to take account of site context and specifics.</p> <p>2. Birmingham has long been using CPO powers to deliver urban regeneration and leverage improvements to housing stock. We will take a proactive approach to identifying and working with public and private landowners to deliver more housing. We will continue to assess opportunities to acquire land and underused or redundant sites that have future development potential. We have undertaken a detailed site search of our land holdings through the urban capacity work for the Local Plan to identify suitable opportunities for both housing and economic development.</p> |
| BLPIO-334 | Joanne Harding | Home Builders Federation | 15/12/22 14:57 | Supports the housing growth options identified. Encourages engagement with nearby authorities and the housebuilding industry. | Birmingham City Council will continue to actively work with neighbouring local authorities to address any housing shortfalls in the HMA. Engagement with the housebuilding industry will continue |

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| | | | | | to take place at key stages throughout the preparation of the Local Plan. |
| BLPIO-374 | Tammy Stokes | Sandwell Metropolitan Borough Council | 21/12/22 14:10 | Sandwell MBC also has shortfall and will not be able to assist BCC in meeting their housing shortfall. Duty to Co-operate discussions will need to take place as to how any housing surpluses in other local authority local plans can be apportioned to meet our respective shortfalls. | Birmingham City Council will need to continue to actively work with Sandwell MBC and other local authorities in the HMA to address housing shortfalls arising in the HMA. |
| BLPIO-392 | Gary Palmer | Solihull Metropolitan Borough Council | 21/12/22 16:30 | The Council is concerned about the level of unmet need BCC has identified, but recognises there are still options to be considered as to how this shortfall can be accommodated within Birmingham. SMBC expects BCC to take all possible options to accommodate the shortfall within Birmingham. | Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-446 | Tarmac Trading Ltd | | 30/12/22 11:24 | It is imperative that engagement occurs during the next stages of preparation of the BLP and agreement is sought between BCC and surrounding authorities over the extent of housing land that is available to contribute towards the substantial shortfall in Birmingham. Further discussions are held with LDC in particular about how they can help meet the housing shortfall. It is essential to explore the full | Birmingham City Council will continue to actively work with neighbouring local authorities to address any housing shortfalls in the HMA. Birmingham is part of the GBBCHMA Development Needs Group - Officer Working Group, which provides a framework for co-ordination between local authorities to ensure that unmet needs within the |

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| | | | | extent of housing that can be delivered in neighbouring authorities before allocating land in the Green Belt. Tarmac is promoting a site at Alrewas Quarry, outside of the Green Belt in Lichfield, that could deliver housing to meet both Lichfield DC and wider HMA (i.e. BCC authorities') needs. | HMA can be satisfactorily addressed where possible. |
| BLPIO-466 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:05 | Green Belt release should not be seen the last resort option once all other options have been exhausted and should be considered at the same time as the other options instead. Other authorities in the HMA will not have the capacity to meet all of the unmet needs. | Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-506 | | Hallam Land Management | 03/01/23 16:38 | Need robust strategy for ensuring shortfall is met in full within the plan period before the plan is adopted including agreement across the HMA. Important that the authorities are not solely reliant on an updated Growth Study to inform any distribution. Consideration of factors such as commuting patterns and functional relationships is also critical. | Birmingham City Council will continue to actively work with other local authorities in the HMA to address housing shortfalls arising in the HMA. |
| BLPIO-510 | | Vistry Group | 03/01/23 16:41 | Need robust strategy for ensuring shortfall is met in full within the plan period before the plan is adopted including agreement across the HMA. | Birmingham City Council will continue to actively work with other local authorities in the HMA to address housing shortfalls arising in the HMA. |

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| <p>BLPIO-514</p> | | <p>Midland Land Ltd</p> | <p>04/01/23 09:46</p> | <ol style="list-style-type: none"> 1. Commence the plan period in 2022 rather than 2020, thereby disregarding the BDP housing requirement for 2020-22. 2. Do not support the current wording of policy TP48 for an early review of the plan being carried forward in to the new Local Plan. The Statement of Common Ground with HMA authorities needs to published as soon as possible. 3. There should be a release of small to medium sized Green Belt sites rather than relying on one single large former Green Belt site as at present. | <ol style="list-style-type: none"> 1. The start date of the plan has been informed by the evidence base, namely the HEDNA which was commissioned in April 2021. The most up to date available data for the HEDNA at the time was 2020 based. 2. Commented noted. 3. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| <p>BLPIO-538</p> | <p>Mr David Joseph</p> | <p>Bloor Homes</p> | <p>05/01/23 09:06</p> | <ol style="list-style-type: none"> 1. Support use of Standard Method. 2. Commence the plan period in 2022 rather than 2020, thereby disregarding the BDP housing requirement for 2020-22. 3. Support identification of housing growth options. 4. Do not support the current wording of policy TP48 for an early review of | <ol style="list-style-type: none"> 1. Support noted. 2. The base date for the plan is aligned with updates to the evidence base. 3. Support noted 4. Objection noted. 5. Birmingham City Council will continue to actively work with neighbouring local authorities to address any housing shortfalls in |

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| | | | | <p>the plan being carried forward in to the new Local Plan.</p> <p>5. The Statement of Common Ground with HMA authorities should contain measurable and deliverable outcomes and needs to published as soon as possible. Unless the Council has an agreed position with all the HMA authorities via an agreement at the time of adoption of the Plan, the Plan will not be sound.</p> <p>6. Focus on increased densities has led to high level of apartment-led schemes within the City centre, to the detriment of family and affordable housing provision.</p> <p>7. Support release of Green Belt. There should be a release of small to medium sized Green Belt sites rather than relying on one single large former Green Belt site as at present.</p> | <p>the HMA. Birmingham is part of the GBBCHMA Development Needs Group - Officer Working Group, which provides a framework for co-ordination between local authorities to ensure that unmet needs within the HMA can be satisfactorily addressed where possible.</p> <p>6. In line with national policy, the Local Plan will seek to optimise densities on housing sites to make better use of land in line with national policy while ensuring that high quality living environments are created and the full range of identified housing needs are met.</p> <p>7. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document.</p> |
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| BLPIO-593 | Mrs A Burkes | Hagley Parish Council | 09/01/23 17:19 | Support the response made by CPRE Worcestershire. The Plan should not look to shortfall being met by additional housing in Hagley due to insufficient infrastructure. | Birmingham City Council will continue to actively work with other local authorities in the HMA to address housing shortfalls arising in the HMA in accordance with national planning policy and legislation. |
| BLPIO-7 | Mr Lewis Lucas | | 04/11/22 08:03 | Residential moorings on canals. | Comments are noted for consideration. |
| BLPIO-24 | Mr Joshua James | Severn Trent Water | 09/11/22 12:26 | No further housing options to add. | Comments are noted. |
| BLPIO-36 | Mr Stuart Morgans | Sport England | 17/11/22 19:12 | Unoccupied properties should be restored first. | The Council's Empty Homes Team has a strong track record of returning long term and problematic empty homes back into use. The Council's current Empty Property Strategy which covers the period 2019-2024 sets an ambitious target of bringing 350 properties per year back into use. Since 2019, 666 empty properties were brought back in to use through the implementation of the strategy. |
| BLPIO-61 | Mr Alex Jones | Gladman Retirement Living ltd | 25/11/22 09:55 | Growth options pursued should ensure that as much development as possible is contained within the Cities administrative | Comment noted. The strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not |

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| | | | | boundaries reducing the residual to be provided in the wider housing market area. Requires a broad strategy of all the options whilst prioritising previously developed land. | be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-85 | Mr John Pearce | Bloor Homes | 01/12/22 12:12 | <ol style="list-style-type: none"> 1. Question the identified supply. 12% lapse rate is too low. Interprets SHLAA sites as windfalls and so windfall allowance is double-counting and not deemed realistic. 2. Council will need to explore options but also work with adjoining local authorities in the HMA to agree on accommodation of shortfall. An early review mechanism such as Policy TP48 of the BDP will not be supported. Plan will only be sound with a signed MoU with all other HMA authorities. | <ol style="list-style-type: none"> 1. Justification for the windfall allowance is set out in the Council's Housing and Employment Land Availability Assessment Methodology, which was subject to consultation. The justification for the 12% lapse rate is also set out in the HELAA. 2. The Council recognises the need for Birmingham to work co-operatively with other local authorities and bodies in the wider area to deal with issues that run across local authority boundaries, particularly any housing shortfalls. |
| BLPIO-107 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 10:55 | No | Noted. |

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| BLPIO-159 | Mr Matthew Williams | Volume Property | 05/12/22 12:27 | Employment sites within the ring road should not be protected for heavy industry and innovative mixed-communities should be pursued in locations such as the Gun Quarter. Not appropriate to continue Summer Lane and wider Gun Quarter as a CEA - insufficient evidence. | The Council is reviewing the Core Employment Areas to identify whether there may be any opportunities repurpose poorer quality and under-used employment land for housing development. |
| BLPIO-341 | Mr John Careford | Stratford-On-Avon District Council | 20/12/22 16:34 | <ol style="list-style-type: none"> 1. Interested as to why this is the case, given that the 2018 based housing projections identify a lower housing need for Birmingham overall. 2. Interested to know how much of the shortfall is likely to be met by other LAs in the HMA. 3. Infrastructure needs of exporting housing would need to be met by BCC. | <ol style="list-style-type: none"> 1. This is explained in paragraphs 6.90 - 6.92 of the Housing and Economic Development Needs Assessment (April 2022). 2. The housing and employment land shortfall have yet to be fully determined as the Council is still in the process of identifying additional housing and employment land supply. 3. Comment regarding infrastructure requirements are noted. Birmingham will continue to work with neighbouring local authorities on infrastructure issues that run across local authority boundaries. |
| BLPIO-347 | Unknown | South Staffordshire District Council | 20/12/22 17:05 | <ol style="list-style-type: none"> 1. South Staffs has already proposed a 4,000 dwelling contribution to the | <ol style="list-style-type: none"> 1. Contribution is welcomed. |

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| | | | | <p>unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) based on the findings of the GBBCHMA Strategic Growth Study 2018.</p> <ol style="list-style-type: none"> 2. BCC should commit to participating in an update of the 2018 strategic growth study before Preferred Options. 3. BCC must fully explore options to increase urban housing supply. How will BCC maximise its own urban capacity? 4. BCC should maximise Green Belt release within its own boundary before seeking Green Belt contributions from other local authorities. The extent of Green Belt release should be led by an update of the GBBCHMA Strategic Growth Study 2018 before being refined by local evidence. 5. Support Options 1, 2 and 5 before considering Option 6. 6. In assessing where to consider release of some employment land | <ol style="list-style-type: none"> 2. BCC has committed to participating in the update of the GBBCHMA Strategic Growth Study 2018 but the timing of this is dependent on all the authorities agreeing to take it forward and consideration of the uncertain national context. 3. As well as looking at the more traditional sources of sites, BCC have undertaken a comprehensive and systematic assessment of land parcels in the city's boundary using an innovative digital planning tool. The purpose of this exercise was to identify additional sites which had not previously been included in the Housing and Employment Land Availability Assessment (HELAA) process. Further detail about this work is contained in the HELAA. 4. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set |
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| | | | | <p>for housing, consideration should be given to the quality of the employment land, the potential suitability of the site in terms of access to public transport and services and the potential ability to produce higher density, space efficient dwellings were this land to be released for housing.</p> | <p>out in the Preferred Options Document.</p> <p>5. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document.</p> <p>6. Agreed. Any potential sites will be assessed in accordance with the HELAA methodology.</p> |
| BLPIO-355 | Unknown | Cannock Chase District Council | 21/12/22 10:05 | <p>Cannock has engaged with the other duty to cooperate partners in assisting to address the previously identified shortfall across the GBBCHMA and considers this is the appropriate approach to resolving any future shortfalls if these cannot be addressed in the Plan.</p> | <p>Comment noted.</p> |
| BLPIO-360 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:12 | <ol style="list-style-type: none"> 1. Walsall Council is not aware of any additional options which should be considered. 2. BCC should ensure all options are pursued to maximise the level of growth in Birmingham. | <ol style="list-style-type: none"> 1. Commented noted. 2. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set |

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| | | | | <p>3. Support higher densities.</p> <p>4. Highly likely that Birmingham City Council will need to consider further opportunities within the Green Belt to deliver its housing need.</p> | <p>out in the Preferred Options Document.</p> <p>3. Support noted.</p> <p>4. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document.</p> |
| <p>BLPIO-380</p> | <p>Ian Culley</p> | <p>Wolverhampton City Council</p> | <p>21/12/22 14:31</p> | <p>1. For Option 5, any potential displacement of employment activity should be accommodated within Birmingham.</p> <p>2. Need to clarify that 2020-2041 housing shortfall effectively removes any requirement to address the historic 2011-31 shortfall.</p> <p>3. BCC to clarify the appropriate sequence of release of land to meet shortfalls to ensure the approach is consistent with para 141 of the NPPF.</p> | <p>1. The Plan will seek to ensure a sufficient supply of employment land to meet the need over the plan period is accommodated.</p> <p>2. Yes, once the new plan is adopted, the shortfall figure will be based on the shortfall arising from the new plan.</p> <p>3. BCC agree that the sequence of release of land to meet shortfalls should be as set out in para. 141 of the NPPF - non-green belt land in Birmingham; non-green belt land in neighbouring authorities; green belt land in Birmingham; green</p> |

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| | | | | <p>4. Wolverhampton also has significant shortfall so no potential to bring forward additional land to meet needs in Birmingham.</p> <p>5. Many authorities across the HMA have already exhausted potential options to meet their own needs along with the needs of neighbours. Highly likely that BCC will need an updated review of its Green Belt.</p> | <p>belt land in neighbouring authorities.</p> <p>4. Comment noted</p> <p>5. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document.</p> |
| BLPIO-386 | Carl Mellor | Dudley Metropolitan Borough Council | 21/12/22 16:06 | <p>1. Support options to maximise use of brownfield land and make effective use of land and options 1 - 5 but it is recognised that the appropriateness of Options 4 and 5 will be informed by the demand for open space and employment need.</p> <p>2. In relation to Option 6 we would welcome an update on whether the Council is preparing to undertake a Green Belt Review at this stage.</p> | <p>1. Support noted.</p> <p>2. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document.</p> |
| BLPIO-411 | Calthorpe Estates | | 29/12/22 14:15 | The provision of build to rent or co-living could enhance the mix of stock and address issues around affordability and diversity. | Build to rent can add to the choice of good quality rented accommodation. Co-living serves a more niche market. |

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| | | | | | Such products will range in their affordability. |
| BLPIO-428 | Jon Morris | Acocks Green Focus Group | 29/12/22 15:45 | <ol style="list-style-type: none"> 1. A much wider range of issues need to be considered beyond just numbers including the need for family housing and graduate retention. 2. Further New Towns may be needed to accommodate overspill. | <ol style="list-style-type: none"> 1. The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures is delivered to meet the needs of the city. 2. Birmingham City Council will continue to actively work with neighbouring local authorities to address any housing shortfalls in the HMA. Birmingham is part of the GBBCHMA Development Needs Group - Officer Working Group, which provides a framework for co-ordination between local authorities to ensure that unmet needs within the HMA can be satisfactorily addressed where possible. |
| BLPIO-448 | Tarmac Trading Ltd | | 30/12/22 11:42 | Object to the principle of introducing residential / conflicting land uses within the existing employment land as Option 5 | Although there are no active mineral workings within the city, the Plan will continue to contain appropriate policy |

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| | | | | could cause. Need to protect mineral infrastructure sites from such development which Tarmac operate in Core Employment Areas. Plan should provide protection for Mineral Safeguarding Areas and Mineral Consultation Areas and safeguard existing, planned and potential sites for mineral handling and processing as current Policy TP16 provides. Reference to the 'agent of change' principle should be incorporated into the plan in line with NPPF paragraph 187. | to ensure potentially valuable mineral deposits are not sterilised and that minerals infrastructure is protected. |
| BLPIO-460 | Emily Barker | Worcestershire County Council | 30/12/22 13:07 | Not Option 4, instead need to enhance all current under-used open space through a programme of assessment that should define a range of multifunctional benefits to the local community and deliver biodiversity net gain. Essential to provide enhanced permeable green infrastructure as well. | The Council acknowledges the importance of green space and will be cognisant of this when preparing policies and site allocations in the Local Plan. |
| BLPIO-480 | Ms Anna Hulme | St. Modwen Properties Plc | 03/01/23 10:48 | Given that there are exceptional circumstances and that neighbouring authorities will be expected to consider release of Green Belt through the Duty to Cooperate BCC should consider option 6 alongside the other proposed options rather than as an option of last resort. | Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |

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| BLPIO-496 | Craig Rowbottom | Arup | 03/01/23 14:42 | <ol style="list-style-type: none"> 1. Approach will require Statement of Common Ground across the HMA. 2. Suggest critical friend review prior to submission of Plan. 3. Tall Buildings policy should be created to ensure appropriate siting and meets city's housing need. 4. Option 5 is a pragmatic response - how to ensure a high level of residential amenity in these areas is key. | <ol style="list-style-type: none"> 1. Birmingham City Council will continue to actively work with neighbouring local authorities to address any housing shortfalls in the HMA. 2. Suggestion noted. 3. The City's Tall Buildings policy is currently set out within the Design Guide SPD and will be addressed through Design Coding. 4. Noted. |
| BLPIO-508 | | St Modwen | 03/01/23 16:39 | Need robust strategy for ensuring shortfall is met in full within the plan period before the plan is adopted including agreement across the HMA. | Birmingham City Council will continue to actively work with other local authorities in the HMA to address housing shortfalls arising in the HMA. |
| BLPIO-520 | | Druids Heath Consortium | 04/01/23 11:18 | <ol style="list-style-type: none"> 1. Commence the plan period in 2022 rather than 2020, thereby disregarding the BDP housing requirement for 2020-22. 2. Do not support the current wording of policy TP48 for an early review of the plan being carried forward in to the new Local Plan. The Statement of Common Ground with HMA | <ol style="list-style-type: none"> 1. The start date of the plan has been informed by the evidence base, namely the HEDNA which was commissioned in April 2021. The most up to date available data for the HEDNA at the time was 2020 based. 2. Commented noted. 3. Comment noted. The preferred strategy will take forward a |

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| | | | | <p>authorities needs to published as soon as possible.</p> <p>3. There should be a release of small to medium sized Green Belt sites rather than relying on one single large former Green Belt site as at present.</p> | <p>combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document.</p> |
| BLPIO-595 | Sarah Mellor | Church Commissioners | 10/01/23 10:30 | <p>Support use of standard method need and should be a minima but should start from 2022 to avoid complications of past delivery. Current BDP policies have meant high density apartment-led development in City Centre to detriment of family housing - emphasis should shift to small to medium sized green belt developments and SUEs. Need to do Green Belt review and reconsider 'Area A2' including associated infrastructure.</p> | <p>It will not be possible to avoid past delivery when a plan takes time to prepare. Even if the Plan started in 2022, delivery between 2022 and submission (2025) will need to be taken into account. The Local Plan will seek to optimise densities on housing sites to make better use of land in line with national policy.</p> |

Question 8 & 9 - What is your preferred option or combination of options, and do you think the proposed densities are appropriate?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-7 | Mr Lewis Lucas | | 04/11/22 08:03 | If densities of 400 units are already being regularly achieved in the city centre we should set a target of 400 units. Higher densities are beneficial. | Comment noted. |
| BLPIO-24 | Mr Joshua James | Severn Trent Water | 09/11/22 12:26 | Building at higher densities contradicts the aim to become a greener city. | The Council does not consider that building at higher densities would contradict becoming a greener city. Optimising densities makes better use of land and can help prevent sprawl and alleviate pressure of development on greenfield and Green Belt. It could potentially lower carbon emissions and air pollution due to shorter travelling distances from new homes to jobs and facilities. |
| BLPIO-61 | Mr Alex Jones | Gladman Retirement Living ltd | 25/11/22 09:55 | Higher densities appropriate in suburban areas (where much need arises) for extra care / retirement villages for older people. Exceeding densities should be tied to appropriate design, scale, massing and the appropriateness of sites. | The Local Plan will seek to optimise densities on housing sites to make better use of land while ensuring that high quality living environments are created and the full range of identified housing needs are met. |

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| BLPIO-85 | Mr John Pearce | Bloor Homes | 01/12/22 12:12 | Increasing densities will deliver higher numbers but not the full range of housing needs, a combination of higher densities and more traditional family housing is needed. | The Local Plan will seek to optimise densities on housing sites to make better use of land while ensuring that high quality living environments are created and the full range of identified housing needs are met. |
| BLPIO-107 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 10:55 | Density standards may be better expressed as a range, e.g. suburban 40-50, local centre 70-80, city centre 300-500. Should be targets for larger family, older residences, rather than one or two bed units aimed at younger individuals / couples. | The suggestions put forward will be considered |
| BLPIO-159 | Mr Matthew Williams | Volume Property | 05/12/22 12:27 | Should be a guide allowing higher or lower densities where a case for this is made. | Comment noted. The policy will contain sufficient flexibility to account for site specific issues. |
| BLPIO-215 | IO Consultation Event - Yardley | | 08/12/22 11:17 | Council owns land that can be used for housing. Selling of council houses diminishes stock of social housing. | <ol style="list-style-type: none"> 1. The Council owns a significant amount of land in the city and the Council's Corporate Plan commits us to using own land assets to deliver additional housing. We have already delivered around 3,000 new homes on our own land through the Birmingham Housing Municipal Trust since 2009 and will be working towards delivering more. We have undertaken a detailed site search of |

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| | | | | | <p>our land holdings through the urban capacity work for the Local Plan to identify suitable opportunities for both housing and economic development.</p> <p>2. Comment noted.</p> |
| <p>BLPIO-283</p> | <p>Mr Peter King</p> | <p>CPRE West Midlands</p> | <p>13/12/22 21:31</p> | <ol style="list-style-type: none"> 1. There appears to be adequate evidence to adopt a lower figure than the Standard Methodology and to challenge the additional '35% uplift' as unjustified. 2. Options for lower numbers should have been included and considered in the SA. 3. There is significantly greater housing supply than the Issues and Options paper suggests. 4. Green Belt release not justified and would lead to unsustainable development patterns and impacts on landscape quality. | <ol style="list-style-type: none"> 1. The government expects the standard method to be used as the starting point for Local Plans and only in exceptional circumstances can a different approach be taken. 2. Noted, the SA report will be published at Regulation 18 stage 3. As noted in the Issues and Options Document, the Council is still in the process of identifying further sites appropriate for inclusion in the housing land supply. 4. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |

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| BLPIO-347 | Unknown | South Staffordshire District Council | 20/12/22 17:05 | Support Option 1, 2 and 5 | Support is noted |
| BLPIO-360 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:12 | Support higher densities but should not be seen as upper limit and could apply to existing allocations and lapsed permissions. | Comments noted. |
| BLPIO-411 | Calthorpe Estates | | 29/12/22 14:15 | <ol style="list-style-type: none"> 1. The proposed densities seem to be reasonable, but policy should not discourage higher densities where they are appropriately located and well justified. It will be critical to ensure that there is flexibility in the policy to allow for site and context specific considerations to be taken into account. 2. Clarity needed as to how 'in and around' definition will work in practice. In the case of mixed-use developments, it will also be important that the policy is clear as to how the average density is calculated. | <ol style="list-style-type: none"> 1. It is acknowledged that the policy will need to be sufficiently flexible to take account of site context and specifics. 2. How the policy will work in practice including its application to mixed use development will be carefully considered and set out in the supporting text. |
| BLPIO-72 | Ms Karen Newman | BOM (Birmingham Open Media) | 28/11/22 12:26 | As retail and office space diminish in City Centre, the cultural offer becomes more important to drive the economy. As the number of city centre residents | The Council recognises the potential and importance of the culture, leisure and recreational facilities in Birmingham. The Creatively Birmingham statement of intent |

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| | | | | increase, there is a need to supply sufficient healthcare, education and park facilities. | sets out the city's shared ambition to grow and develop Birmingham's diverse creative, cultural and arts sector over the next decade. A Creatively Birmingham Strategy will be developed to support an deliver an inclusive, accessible, sustainable and economically vibrant arts, culture and creative sector. The Local Plan will propose a more proactive approach to enabling and managing the evening and night time economy. The objectives of the Plan include the provision of essential infrastructure to support development in a co-ordinated and timely manner and the creation of safe, attractive and sustainable neighbourhoods where there is good access to services and facilities within walking and cycling distance |
| BLPIO-89 | Mr Thomas Ashley | Steenvlinder UK | 02/12/22 12:17 | Support Option 2, 4 and 5 | Support for these options is noted. |
| BLPIO-121 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, | 04/12/22 21:07 | Refer to our Call for Sites submission for the consolidation of the sporting activities at Birmingham Wheels Park. | Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |

| | | organisations and businesses formerly operating at the site | | | |
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| <u>BLPIO-141</u> | Mr John Pearce | Bloor Homes | 05/12/22 10:09 | Continued reliance on high density apartment schemes will result in other housing needs going unmet such as much needed sites for family, including affordable housing. Frankley site would help to deliver this. | The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. |
| <u>BLPIO-181</u> | Mr Peter Chambers | David Lock Associates on behalf of Birmingham Property Services | 05/12/22 15:17 | Support Option 1 to 6 | Support is noted |
| <u>BLPIO-185</u> | Zaza Cooper | Mondelez International | 05/12/22 16:01 | Support Option 4. | Support is noted |
| <u>BLPIO-193</u> | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 16:46 | Support higher densities appropriate to the area with sufficient green and open space provision. High rise is not appropriate for families with children nor for elderly or people with mobility difficulties. | In line with national policy, the Local Plan will seek to optimise densities on housing sites to make better use of land in line with national policy while ensuring that high quality living environments are created and |

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| | | | | | the full range of identified housing needs are met. |
| BLPIO-330 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:22 | A blanket requirement for all tall building applications to be full applications may not be desirable. A policy guiding appropriate locations for tall buildings and setting out design guidance could have merit. | Comments are noted. Policy on tall buildings will be addressed through the Design Code for the City. |
| BLPIO-334 | Joanne Harding | Home Builders Federation | 15/12/22 14:57 | <ol style="list-style-type: none"> 1. Support all options with particular emphasis on Green Belt release. 2. Support increasing densities providing an appropriate housing mix can be delivered and that other policy requirements can be met. | <ol style="list-style-type: none"> 1. Comments are noted. 2. The Local Plan will seek to optimise densities on housing sites to make better use of land while ensuring that high quality living environments are created and the full range of identified housing needs are met. |
| BLPIO-16 | Janelle Kolas | | 04/11/22 09:46 | Higher density housing allows the city to be more pedestrian accessible | Comment noted. |
| BLPIO-132 | Mr David Carter | Tyler Parkes | 05/12/22 09:30 | Four 'call for sites' submissions made on behalf of Walter Smith Farms Ltd. | Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-156 | Mrs Fiona Adams | The Moseley Society | 05/12/22 11:35 | Higher densities will impact on open spaces and could result in cramped and over-developed sites but high density can still provide good living conditions. | The Local Plan will seek to optimise densities on housing sites to make better use of land while ensuring that high quality living environments are created and the |

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| | | | | An option is to build more townhouses that make more efficient use of the plot by building upwards. | full range of identified housing needs are met. |
| BLPIO-164 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 12:46 | Higher densities will impact on open spaces and result in cramped and over-developed sites of reduced quality. | The Local Plan will seek to optimise densities on housing sites to make better use of land while ensuring that high quality living environments are created and the full range of identified housing needs are met. |
| BLPIO-239 | Mrs Michaela Moore | Hammerson - Bullring and Grand Central | 13/12/22 12:43 | Uplifting densities is supported while still allowing for other policy requirements to be delivered so that the housing mix proposed still meets the local housing needs. | The Local Plan will seek to optimise densities on housing sites to make better use of land while ensuring that high quality living environments are created and the full range of identified housing needs are met. |
| BLPIO-247 | IO Consultation Event - Bham Lib | | 13/12/22 13:36 | <ol style="list-style-type: none"> 1. Need to build to higher densities. 2. Don't need more tall buildings. High rise buildings have an impact on the local environment. 3. Family housing - lower densities. 4. Don't want to lose open spaces to development. 5. Need to consider the wider impacts of construction | <ol style="list-style-type: none"> 1. The Local Plan will seek to optimise densities on housing sites to make better use of land but also ensure that high quality living environments are created and deliver housing that meets a variety of needs including families. 2. The Council acknowledges the importance of green space and will be cognisant of this when preparing |

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| | | | | | <p>policies and site allocations in the Local Plan.</p> <p>3. The Local Plan will encourage the best use of existing buildings and efficient use of land. The Plan will explore policy which deals with all of the carbon associated with new buildings including the energy needed to power them (operational energy) and that needed to construct and decommission them (embodied energy).</p> |
| BLPIO-264 | Unknown | Westside Business Improvement District | 13/12/22 15:42 | <p>May be worthwhile considering an even higher density tied to other policy changes such as perhaps the reduction in car parking provision. More traditional family sized dwellings built at the edges of the city with space for gardens. High density should follow London Plan policy which bases provision on connectivity and future planned levels of infrastructure rather than existing.</p> | Comments noted. |
| BLPIO-284 | Mr Ed Barrett | Catesby Estates | 13/12/22 22:23 | <p>Already clear that exceptional circumstances exist for undertaking a green belt review and releasing Green Belt. Smaller scale green belt sites would release land more quickly</p> | <p>Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will</p> |

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| | | | | e.g. Kempson Avenue, Wylde Green (CFS Ref 1b4210) | be set out in the Preferred Options Document. |
| BLPIO-304 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:25 | Higher densities in city centre is appropriate. Elsewhere, should avoid the strict application of a specific figure. | In line with national policy, the Local Plan will seek to optimise densities on housing sites to make better use of land in line with national policy while ensuring that high quality living environments are created and the full range of identified housing needs are met. |
| BLPIO-408 | Dr Peter King | CPRE Worcestershire | 29/12/22 13:32 | Supportive of Option 1, 2, 3 and 5 | Support for these options is noted. |
| BLPIO-420 | Jane Field | Environment Agency | 29/12/22 15:27 | <ol style="list-style-type: none"> 1. Focus should be on reuse of brownfield land and remediation. Loss of Green Belt would be very damaging to the environment as well as loss of access to open green space for wellbeing. 2. Important to protect groundwater quality. Higher densities should also ensure adequate space for water, green infrastructure, de-culverting. | <ol style="list-style-type: none"> 1. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. 2. Comment noted. The Plan will continue to seek to protect and enhance water quality, green infrastructure and encourage de-culverting. |

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| BLPIO-437 | Imogen Forster | St Joseph Homes Limited | 30/12/22 09:30 | <ol style="list-style-type: none"> 1. A combination of Options 1, 2, 3, and 5 will be the best blend of options to overcome this shortfall of housing. 2. Option 4 is not appropriate in most instances, given the need to protect open space within the city. 3. Higher densities have been achieved in recent large developments in the City Centre. A higher minimum density should be applied within the new plan, aligned with the Design Guide 2022. | <ol style="list-style-type: none"> 1. Comment noted. 2. Comment noted. 3. We will be undertaking a review of more recently completed and consented development to help inform any proposed policy on minimum residential densities. |
| BLPIO-473 | | Midlands Land Portfolio Ltd | 30/12/22 15:00 | <ol style="list-style-type: none"> 1. The Green Belt in Sutton Coldfield is the most appropriate location to deliver sustainable urban extensions and a significant amount of housing 2. There needs to be flexibility for lower densities to be applied for suburban development. | <ol style="list-style-type: none"> 1. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document 2. The policy will contain sufficient flexibility to account for site specific issues. |

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| BLPIO-31 | Mrs Nuala Palmer | | 09/11/22 16:01 | Higher densities are not good for people's quality of life. | The Local Plan will seek to optimise densities on housing sites to make better use of land but also ensure that high quality living environments are created. |
| BLPIO-94 | Philippa Kreuser | | 02/12/22 15:58 | Support Option 6 | Support is noted |
| BLPIO-114 | Dr Mike Hodder | Council For British Archaeology , West Midlands | 04/12/22 11:19 | Some open and green belt areas contain designated and non-designated heritage assets or as yet unrecognised heritage assets, particularly archaeological remains. | All constraints including heritage assets will be assessed when considering sites for development. |
| BLPIO-195 | IO Consultation Event - Sutton Cold | | 05/12/22 16:52 | <ol style="list-style-type: none"> 1. Use empty offices. 2. No housing above shops. 3. Need more green spaces, don't build on any green spaces or greenbelt. 4. Support repurposing industrial land. 5. Support increasing densities in the city centre but not the suburbs. | <ol style="list-style-type: none"> 1. The use of brownfield land and vacant and under-used buildings has and will continue to be a key part of Birmingham's development strategy. 2. Empty space above shop units represents a significant waste of floorspace and an untapped resource. Non-retail uses such as offices and homes on the upper floors of buildings within existing centres could be given more policy support provided that they do not have a negative impact upon the operation of the existing ground |

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| | | | | | <p>floor business or the amenities of potential future occupants.</p> <p>3. The Council acknowledges the importance of green space and will be cognisant of this when preparing policies and site allocations in the Local Plan.</p> <p>4. Comment noted.</p> <p>5. The Local Plan will seek to optimise densities on housing sites to make better use of land. The minimum density standards in the current Birmingham Development are being reviewed with a view to increasing the standard in the city centre and urban centres and areas well served by public transport.</p> |
| <p>BLPIO-209</p> | <p>IO Consultation Event - Northfield</p> | | <p>08/12/22 09:32</p> | <ol style="list-style-type: none"> 1. There needs to be an alternative to high-rise buildings as an option for social housing 2. Supportive of higher density to solve housing backlog 3. Access to the developments is important | <ol style="list-style-type: none"> 1. Birmingham Municipal Housing Trust (BMHT), Birmingham City Council's housebuilding arm, has been the main provider of new social housing since it was established in 2009. The majority of homes that BMHT has delivered has been traditional family housing. 2. Support noted. |

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| | | | | | 3. The Plan will ensure that new development will be well served by existing or new infrastructure and accessible to local services and facilities by sustainable transport modes. |
| <u>BLPIO-254</u> | | West Midlands Housing Association Planning Consortium (WMHAPC) | 13/12/22 14:47 | See the suggestions Question 7 | See response to Question 7. |
| <u>BLPIO-310</u> | | Olympian | 14/12/22 15:19 | Support setting of minimum density levels. Support increasing city centre density to 400 dph. Believe densities within 400m of a centre could and well served by public transport could be increased to 100 dph. | Comments welcomed. The Council will be undertaking a review of more recently completed and consented development to help inform any proposed policy on minimum residential densities. |
| <u>BLPIO-314</u> | | Langley Sutton Coldfield Consortium | 14/12/22 15:41 | Density policies should not result in a ‘blanket’ increase in expected density in suburban locations. NPPF does not require minimum densities to be set for all locations. BDP Policy GA5 - Langley should be delivered at 35-40dph and this approach should continue in new Plan. | The outline planning consent for Langley sets out an overall number of dwellings required across the site and the reserved matters will be determined in accordance with the outline consent. |

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| BLPIO-318 | Paul Gilmour | Dale Farm | 14/12/22 15:46 | <ol style="list-style-type: none"> 1. Poor open space should be regenerated and made better, not built on. 2. Dwelling density targets should reflect the average in the neighbourhood with a 10% uplift. A drive for density pushes development to provide flats and small dwellings that do not meet identified need. | <ol style="list-style-type: none"> 1. The Council acknowledges the importance of open space and will be cognisant of this when preparing policies and site allocations in the Local Plan. 2. The Local Plan will seek to optimise densities on housing sites to make better use of land while ensuring that high quality living environments are created and the full range of identified housing needs are met. |
| BLPIO-367 | Rosamund Worrall Unknown | Historic England | 21/12/22 12:58 | <ol style="list-style-type: none"> 1. High density could come at the expense of the historic environment and incrementally erode the uniqueness of Birmingham. 2. Plan review needs to include consideration of tall buildings through evidence base work culminating in tall building strategy or policy. | <ol style="list-style-type: none"> 1. The Local Plan will seek to optimise densities on housing sites to make better use of land in line with national policy. 2. Comment noted. There are forthcoming national requirements for all Local Authorities to produce a Design Code for their whole area. BCC will prepare a standalone Design Code sit alongside the Local Plan, which will have equal status to the Local Plan. It is intended that tall buildings will be addressed through the Design Code. |

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| BLPIO-447 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 11:27 | <ol style="list-style-type: none"> 1. RPS consider that for a sustainable urban extension the Green Belt areas in Sutton Coldfield are the most appropriate locations to deliver a significant amount of housing 2. There needs to be flexibility for lower densities to be applied for suburban development. | <ol style="list-style-type: none"> 1. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. 2. The policy will contain sufficient flexibility to account for site specific issues. |
| BLPIO-483 | | MKF Investments | 03/01/23 11:32 | Support Option 4 | Support is noted |
| BLPIO-491 | | University of Birmingham | 03/01/23 13:24 | Support Option 1 to 6 | Support is noted |
| BLPIO-503 | | St. Philips Land | 03/01/23 15:05 | Support Option 1 to 6 | Support is noted |
| BLPIO-527 | Dr Peter Fawcett | Gladman Developments Ltd | 04/01/23 15:20 | Support Option 1 to 6 | Support is noted |
| BLPIO-529 | | MEPC Limited | 04/01/23 16:11 | Supportive of higher densities. These should not be seen as an upper limit and there must be flexibility to deliver higher density development, particularly within the city centre. | The Local Plan will seek to optimise densities on housing sites to make better use of land while ensuring that high quality living environments are created and the full range of identified housing needs are met. It is acknowledged that the policy will |

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| | | | | | need to be sufficiently flexible to take account of site context and specifics. |
| BLPIO-545 | Mark Sullivan | CPRE Warwickshire | 05/01/23 11:58 | Support Option 1 to 5 | Support is noted |
| BLPIO-567 | IO Consultation Event - Ladywood | | 09/01/23 09:33 | Keep density levels and development levels as they are to avoid over-development | The Local Plan will seek to optimise densities on housing sites to make better use of land but also ensure that high quality living environments are created. |
| BLPIO-585 | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:45 | Birmingham Plan should have higher density targets. The new housing at Perry Barr is a good example of new standards of suburban density, and this should set the benchmark for similar strategic centres throughout the city's suburbs. Needs to be based on good quality design. Park Central sets a good example of this approach locally, but historically the Georgian squares of central London set a similar good precedent. | We will be undertaking a review of more recently completed and consented development to help inform any proposed policy on minimum residential densities. |
| BLPIO-466 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:05 | 1. The Green Belt in the Sutton Coldfield area is the most appropriate location for sustainable urban extensions to deliver a significant amount of housing. | 1. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this |

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| | | | | <p>2. There needs to be flexibility for lower densities to be applied for suburban development.</p> | <p>will be set out in the Preferred Options Document.</p> <p>2. The policy will contain sufficient flexibility to account for site specific issues.</p> |
| BLPIO-514 | | Midland Land Ltd | 04/01/23 09:46 | <p>1. 40 dph in suburban locations is appropriate but higher densities in more central locations will only lead to further small apartments being developed rather than family housing of which there is a greater unmet need.</p> <p>2. Land at Dark Lane (in Bromsgrove local authority area) is suitable for residential and can help to meet shortfall as site is near Birmingham.</p> | <p>1. The Local Plan will seek to optimise densities on housing sites to make better use of land while ensuring that high quality living environments are created and the full range of identified housing needs are met.</p> <p>2. Birmingham City Council will continue to actively work with Bromsgrove District Council and other local authorities in the HMA to address housing shortfalls arising in the HMA.</p> |
| BLPIO-538 | Mr David Joseph | Bloor Homes | 05/01/23 09:06 | <p>40 dph in suburban locations is appropriate but higher densities in more central locations will only lead to further small apartments being developed rather than family housing of which there is a greater unmet need. The minimum density thresholds contained within the BDP do not prevent</p> | <p>In line with national policy, the Local Plan will seek to optimise densities on housing sites to make better use of land in line with national policy while ensuring that high quality living environments are created and the full range of identified housing needs are met.</p> |

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| | | | | sites of a higher density coming forward where they are suitable. | |
| BLPIO-554 | IO Consultation Event - Erdington | | 06/01/23 16:40 | Need to maintain and build at low densities | In line with national policy, the Local Plan will seek to optimise densities on housing sites to make better use of land in line with national policy while ensuring that high quality living environments are created and the full range of identified housing needs are met. |
| BLPIO-574 | IO Consultation Event - Stirchley | | 09/01/23 12:04 | Need fewer tall buildings and lower densities | The Local Plan will seek to optimise densities on housing sites to make better use of land but also ensure that high quality living environments are created. |
| BLPIO-520 | | Druids Heath Consortium | 04/01/23 11:18 | <ol style="list-style-type: none"> 1. 40 dph in suburban locations is appropriate but higher densities in more central locations will only lead to further small apartments being developed rather than family housing of which there is a greater unmet need. 2. Land south of Druids Lane (in Bromsgrove local authority area) is suitable for residential and can help to meet shortfall as site is near Birmingham. | <ol style="list-style-type: none"> 1. The Local Plan will seek to optimise densities on housing sites to make better use of land while ensuring that high quality living environments are created and the full range of identified housing needs are met. 2. Birmingham City Council will continue to actively work with Bromsgrove District Council and other local authorities in the HMA to address housing shortfalls arising in the HMA. |

OFFICIAL

Question 11 - What type, size and tenure of homes do you think will be needed in the future?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-54 | Mr Alex Jones | Gladman Retirement Living ltd | 23/11/22 15:09 | Population of older people is increasing and need better choice as PPG states as well as Local Plans needing clear policies to address needs of older and disabled people. Plan should set clear policies for different types of housing and the right amount for extra care for example (as the fastest growing type for older people) using new models such as Older Persons Housing Need Model 2022 DLP/SPRU. Prevalence rates predicted by such models are higher than the Council suggests or the HEDNA predicts and should be revised. | The guidance suggests we use models such as the Housing LIN model which is exactly what has been used by Icen in the HEDNA. While other models would suggest a higher need there are likely to be others which may suggest a lesser need. We are therefore content that our approach is robust. |
| BLPIO-111 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:07 | Better mix of housing in the city centre, e.g. family housing (including multi generational) and older people housing. | The Council’s Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. |

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| <p>BLPIO-219</p> | <p>IO Consultation Event - Northfield</p> | | <p>08/12/22 11:39</p> | <ol style="list-style-type: none"> 1. Need more traditional family housing with gardens not just flats 2. Repair / condition of social housing needs to be better 3. Need more affordable housing, especially social housing 4. Priority to local people and first time buyers 5. New housing should be accessible for people with disabilities 6. Developments must be supported by community facilities, for example schools, health, youth groups. | <ol style="list-style-type: none"> 1. The latest Housing and Economic Development Needs Assessment (April 2022) evidences a need for all sizes of accommodation but the largest demand is for 2 and 3 bed properties. The Plan will seek to ensure an appropriate housing mix is delivered which meets the housing needs of the city. 2. The Council's recently adopted Housing Strategy commits to delivering a comprehensive stock condition improvement programme of Council stock at a rate of 10% per year over the next 5 years. 3. The Council recognises that there is a need to boost the delivery of affordable housing in Birmingham and one of the key objectives of the Local Plan and Housing Strategy to deliver a step change in affordable housing provision. The Council's latest Housing and Economic Development Needs Assessments (April 2022) evidences a significant need for social/ affordable rented accommodation which the Local Plan will seek to address. |
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| | | | | | <p>4. The provision of discounted market sales housing (including First Homes) will assist first time buyers.</p> <p>5. The current Local Plan requires developments of a certain threshold to provide at least 30% of dwellings as accessible and adaptable homes.</p> <p>6. The Plan will ensure that new development will be well served by existing or new infrastructure and accessible to local services and facilities by sustainable transport modes.</p> |
| BLPIO-267 | Miss Constantia Cooper-Jones | Resident Group/Resident | 13/12/22 15:49 | Need more homes for the elderly to cater for their specific needs. | The Plan will seek to deliver housing growth to meet the varied housing needs of the city which will include housing for older people. |
| BLPIO-311 | | Olympian | 14/12/22 15:27 | Research by Savill's shows that Birmingham has one the highest undersupplies of both PBSA and Buy-to-let housing of university cities across the UK. Sites such as 224 Broad Street, and the Broad Street area in general, being well suited to providing such housing. | The Plan will provide policy on purpose built student accommodation to ensure sufficient supply of good quality accommodation is provided in suitable and sustainable locations, is well designed and protects local amenity. |

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| BLPIO-320 | Paul Gilmour | Dale Farm | 14/12/22 15:48 | Significant need for family homes of all tenures. Gap in provision is for houses rather than for flats | The Council’s Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. |
| BLPIO-484 | | MKF Investments | 03/01/23 11:40 | <ol style="list-style-type: none"> 1. A broad range of housing is required but there is a particular need for larger residential properties. 2. Densities should be considered alongside the need for larger family dwellings. 3. The needs of specific groups should be met by allocating specific sites rather than as a percentage of overall development. | <ol style="list-style-type: none"> 1. The Council’s Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. 2. In line with national policy, the Local Plan will seek to optimise densities on housing sites to make better use of land in line with national policy while ensuring that high quality living environments are created and the full range of identified housing needs are met. 3. Comment noted. |

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| <p>BLPIO-528</p> | <p>Marc Hoenen</p> | <p>NHS Property Services</p> | <p>04/01/23 15:40</p> | <ol style="list-style-type: none"> 1. Healthcare infrastructure needs to be delivered alongside housing growth, and should be incorporated in to CIL and S106 requirements. 2. NHS land and property should be supported to grow and expand 3. Further engagement is advised between the City Council, NHS Property Services, NHSPS and ICB. | <ol style="list-style-type: none"> 1. We will continue to work with the NHS regarding policies securing the health and wellbeing of residents, visitors and businesses within Birmingham. The Infrastructure Development Plan will be reviewed to set out the types of infrastructure required from development. 2. The Plan will continue to support the development and improvement of existing health care infrastructure required to support growth provided they meet the requirements of other policies in the Local Plan. 3. Comment noted. Representation also requests that NHS Birmingham and Solihull Integrated Care Board (ICB) is added to the consultation database. SD actioned this on 04/01/23. |
| <p>BLPIO-586</p> | <p>Councillor Julien Pritchard</p> | <p>Green Party Group</p> | <p>09/01/23 16:49</p> | <p>Need more family homes that are genuinely affordable and also need good quality 1-2 bedroom homes that are affordable.</p> | <p>The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city.</p> |

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| BLPIO-133 | Mr David Carter | Tyler Parkes | 05/12/22 09:35 | Appropriate mix informed by the evidence base and delivering sites in partnership with BMHT. Need to ensure that new family-sized accommodation is promoted in suitable locations. | The Council’s Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures is delivered, to meet the housing needs of the city including families. |
| BLPIO-217 | IO Consultation Event - Yardley | | 08/12/22 11:31 | <ol style="list-style-type: none"> 1. Cost of living is a real issue - need more affordable housing options 2. The city needs new housing development 3. Homelessness is an issue and the city needs more safe hostels as well as for immigrants and/or refugees | <ol style="list-style-type: none"> 1. The Council recognises the need to boost the delivery of affordable housing in Birmingham and one of the key objectives of the Local Plan and Housing Strategy to deliver a step change in the provision of affordable housing to meet the identified need. 2. The Local Plan recognises the need to deliver a significant amount of new housing over the plan period to meet the identified housing need. The preparation of the new Local Plan will help to ensure sufficient provision is made for housing land supply. 3. The Council's recently adopted Housing Strategy 2023-2028 makes a commitment to reduce homelessness through an early |

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| | | | | | <p>intervention and prevention model, a cross-directorate initiative aiming to improve the accessibility of localised advice before people reach crisis point. There is a strong Homelessness Partnership Board which is well established and brings robust partnerships together to create pathways for citizens. This is supported by a Homelessness Prevention strategy, due for renewal next year. There is a recognition that the number of households living in temporary provision is unsustainable and Birmingham are working towards developing a specific strategy that focuses on accelerating move on opportunities for these households. There is a £60m property acquisitions scheme in operation to increase the supply available specifically for homeless households. The council are directly purchasing properties on the open market, focused on large families.</p> |
| BLPIO-240 | Mrs Michaela Moore | Hammerson - Bullring and Grand Central | 13/12/22 12:49 | Ensure sufficient flexibility is provided to take into account wider factors such as location, site characteristics and viability | It is acknowledged that policy on housing type, size and tenure will need to be sufficiently flexible. |

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| <p>BLPIO-265</p> | <p>Unknown</p> | <p>Westside Business Improvement District</p> | <p>13/12/22 15:46</p> | <p>1. Need higher density in city centre but these are not appropriate for families. Encourage mix of privately owned and rented 1 and 2 bedroom apartments for professionals (without children) within Westside. Current stipulations of % of 1 and 2 beds need to be readdressed and allow the market to decide.</p> <p>2. Currently no purpose-built student accommodation blocks within the Westside area which is an ideal location as well as for co-living. Built to Rent should also be given proper consideration in the area as well as extra care/retirement to free up traditional family housing elsewhere.</p> | <p>1. The Local Plan will seek to optimise densities on housing sites to make better use of land while ensuring that high quality living environments are created and the full range of identified housing needs are met.</p> <p>2. The Council’s Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city.</p> |
| <p>BLPIO-285</p> | <p>Mr Ed Barrett</p> | <p>Catesby Estates</p> | <p>13/12/22 22:30</p> | <p>To meet the housing needs of all residents, greater consideration will need to be given to greenfield development and not just brownfield.</p> | <p>Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document.</p> |

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| BLPIO-305 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:34 | In the city centre, there is a need to build more homes to a higher density but these are not appropriate for families. Larger family housing can be met on sites such as proposed site at Walmley Golf Club. | The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-450 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:05 | Needs will change over time and so policy should be flexible and be able to take in to account updated future evidence. | It is acknowledged that policies will need to be sufficiently flexible to take account of site context and specifics. |
| BLPIO-474 | | Midlands Land Portfolio Ltd | 30/12/22 15:11 | Needs will change over time and so policy should be flexible and be able to take in to account updated future evidence. | It is acknowledged that the policy on housing mix will need to be sufficiently flexible. |
| BLPIO-530 | | MEPC Limited | 04/01/23 16:20 | <ol style="list-style-type: none"> 1. Any build to rent policy must not be restrict it to specific geographical areas unless underpinned by clear evidence, and an 'exception' allowance incorporated for proposals outside of that area. 2. Any policy requirements for older people housing must be underpinned by appropriate | Policies will be underpinned by evidence, comply with national policy and guidance and contain sufficient flexibility. |

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| BLPIO-90 | Mr Thomas Ashley | Steenvlinder UK | 02/12/22 12:19 | <p>No mention of Self and custom build homes given prominence by Government and offers opportunities and choices for small and medium local builders. A clear strategy on this needs to be included. Policy DM13 in the DMB provides only general passive support and would not help to bring forward such development and fails to meet legal obligations of the 2016 Act.</p> <p>Specific sites also need to be identified in the Plan e.g. land interests at Lakeside Centre, Lifford Land, Kings Norton & Land to west of Worcester & Birmingham Canal and south of River Rea, Kings Norton.</p> | The Development Management in Birmingham DPD (adopted December 2021) already contains a positive policy on self and custom build. The allocation of specific sites for self and custom build will be explored. |
| BLPIO-142 | Mr John Pearce | Bloor Homes | 05/12/22 10:10 | <p>Over reliance on City Centre Apartment Schemes. Sites such as at Frankley are able to accommodate a full range of housing types, sizes and tenures.</p> | The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. Call for Site submissions will be assessed in the |

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| | | | | | context of the emerging development strategy of the Local Plan. |
| BLPIO-158 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:23 | A mix of all types to enable properly mixed communities to develop, allowing people to move within their own communities as their housing needs change during their life times. | The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. |
| BLPIO-166 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:07 | A mix of all types. | The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. |
| BLPIO-274 | IO Consultation Event - Moseley | | 13/12/22 16:09 | Concerned about high concentrations of HMOs. | The Council recognises that high concentrations of HMOs can be harmful to residential amenity and balanced communities and is committed to maintaining and creating thriving sustainable neighbourhoods. With this in mind, the City Council introduced a city-wide Article 4 Direction in relation to change of use from C3 dwellings to C4 HMOs in June |

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| | | | | | <p>2020 followed by a stronger local planning policy on HMOs (DM11) through the Development Management in Birmingham Document December 2021 and a Supplementary Planning Document on HMOs in April 2022. With these three tools in place, the Council will be able to better manage the growth of HMOs across the city.</p> |
| <p>BLPIO-291</p> | | <p>Henley Investment Management Ltd</p> | <p>14/12/22 11:29</p> | <ol style="list-style-type: none"> 1. Plan should not be skewed towards owner occupation and be flexible to recognise other tenures and formats. 2. Not just about provision of affordable homes but raising educational standards and earnings. 3. BCC should be willing to combine its sites with the private sector as well as use CPOs to enable assembly. 4. Priority for brownfield land is supported. | <ol style="list-style-type: none"> 1. The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. 2. Raising skills, educational attainment and productivity is a key priority for Birmingham City Council, the Greater Birmingham and Solihull Local Enterprise Partnership and the West Midlands Combined Authority. 3. Birmingham has long been using CPO powers to deliver urban regeneration and leverage |

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| | | | | | <p>improvements to housing stock. We will take a proactive approach to identifying and working with public and private landowners</p> <p>to deliver more housing. We will continue to assess opportunities to acquire land and underused or redundant sites that have future development potential. We have undertaken a detailed site search of our land holdings through the urban capacity work for the Local Plan to identify suitable opportunities for both housing and economic development.</p> |
| BLPIO-331 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:24 | Co-living should be encouraged and facilitated through the Plan | The Plan will include a policy on co-living to ensure they meet the housing needs of the city, are appropriately located and provide a high quality of accommodation. |
| BLPIO-467 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:15 | Needs will change over time and so policy should be flexible and be able to take in to account updated future evidence. | It is acknowledged that policies will need to be sufficiently flexible to take account of site context and specifics. |
| BLPIO-515 | | Midland Land Ltd | 04/01/23 10:36 | Make sufficient sites available in order to deliver sufficient family housing. | The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, |

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| | | | | | types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. |
| BLPIO-539 | Mr David Joseph | Bloor Homes | 05/01/23 10:20 | <ol style="list-style-type: none"> 1. Make sufficient sites available in order to deliver sufficient family housing. 2. If the Council introduces a policy in relation to house type, size and tenure, sufficient flexibility must be provided | <ol style="list-style-type: none"> 1. The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. 2. It is acknowledged that policies will need to be sufficiently flexible to take account of site context and specifics. |
| BLPIO-576 | IO Consultation Event - Stirchley | | 09/01/23 12:14 | <ol style="list-style-type: none"> 1. Need to enforce against unauthorised HMOs 2. Need more affordable housing, housing for families, students and first time buyers, elderly people's housing, special needs housing | <ol style="list-style-type: none"> 1. The Council is committed to taking enforcement action on unauthorised HMOs where appropriate. Further detail can be found in the Council's Local Enforcement Plan. 2. The Council's latest Housing and Economic Development Needs Assessment (April 2022) evidences a |

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| | | | | <p>3. Bring more empty homes back into use</p> | <p>need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures is delivered to meet the housing needs of the city including affordable housing, housing for families, students, first time buyers, elderly people, and special needs housing.</p> <p>3. The Council’s Empty Homes Team has a strong track record of returning long term and problematic empty homes back into use. The Council’s current Empty Property Strategy which covers the period 2019-2024 sets an ambitious target of bringing 350 properties per year back into use. Since 2019, 666 empty properties were brought back in to use through the implementation of the strategy.</p> |
| <p>BLPIO-8</p> | <p>Mr Lewis Lucas</p> | | <p>04/11/22 08:23</p> | <p>City centre needs more high density and high-rise 1, 2 and 3 bed apartments aimed at young professionals. Suburban town centres and inner city suburbs need mid-rise apartment blocks containing 1,2 and 3 bed apartments. Developments of this</p> | <p>The Local Plan will seek to optimise densities on housing sites to make better use of land. The minimum density standards in the current Birmingham Development are being reviewed with a view to increasing the standard where appropriate. The Council's latest Housing and Economic Development</p> |

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| | | | | scale should be encouraged in all available plots in the inner-city suburbs. Not just at sites near suburban town centres. The suburbs needs family housing with a maximum of 18% social housing. The majority of the houses should be 4 bed, built over 3 storeys. | Needs Assessment (April 2022) evidences a need for all sizes of accommodation but the largest demand is for 2 and 3 bed properties. The Plan will seek to ensure an appropriate housing mix is delivered which meets the housing needs of the city. The HEDNA evidences a significant need for social/ affordable housing. One of the key objectives of the Local Plan and Housing Strategy is to deliver a step change in affordable housing provision. |
| BLPIO-25 | Mr Joshua James | Severn Trent Water | 09/11/22 12:27 | No specific comments | Noted. |
| BLPIO-37 | Mr Stuart Morgans | Sport England | 17/11/22 19:17 | Conversion of neglected, unoccupied properties should be restored into 2 bedroom flats for small families. One bedroom flats for the city centre. | The Local Plan will encourage the best use of existing buildings and efficient use of land. The Council's Empty Homes Team has a strong track record of returning long term and problematic empty homes back into use. The Council's current Empty Property Strategy which covers the period 2019-2024 sets an ambitious target of bringing 350 properties per year back into use. Since 2019, 666 empty properties were brought back in to use through the implementation of the strategy. |

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| BLPIO-86 | Mr John Pearce | Bloor Homes | 01/12/22 12:13 | <p>One and two bedroom apartments are not the answer to meeting the City's future housing needs. Whilst it has helped certain needs (younger people), there is not enough larger premises for them to move on to and so a greater proportion of family sized homes is required.</p> | <p>The Council's latest Housing and Economic Development Needs Assessment (April 2022) evidences a need for all sizes of accommodation but the largest demand is for 2 and 3 bed properties. The Plan will seek to ensure an appropriate housing size, type and tenure of housing is delivered which meets the needs of the city.</p> |
| BLPIO-176 | Miss Helen Davies | Transport for West Midlands | 05/12/22 14:44 | <p>WMCA favours increased housing growth, through increased densities first and foremost along key transport corridors or close to transport hubs including railway stations and public transport interchanges as well as in the city centre and town centres. Plan should increase minimum housing density levels in the city centre to up to 400 per hectare and in town centres to at least 170 per hectare.</p> | <p>The Local Plan will seek to optimise densities on housing sites to make better use of land. The minimum density standards in the current Birmingham Development are being reviewed with a view to increasing the standard in the city centre and urban centres and areas well served by public transport. We will be undertaking a review of more recently completed and consented development to help inform any proposed policy on minimum residential densities.</p> |
| BLPIO-197 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 16:57 | <ol style="list-style-type: none"> 1. Council's current target of 35% affordable housing is not being met. This needs to be challenged. 2. Overwhelming need for more good quality social housing. 3. The Council itself should become the land owners and | <ol style="list-style-type: none"> 1. Where development proposals do not provide policy compliant amount of affordable housing, the City Council requires planning applications to be accompanied by a viability assessment. The Council undertakes an independent assessment of the developer's assessment, paid for by the |

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| | | | | <p>developers of social housing for rent.</p> | <p>applicant. The Council does challenge the assessment and have negotiated significant amounts of extra s106 contributions from that which was initially offered by applicants.</p> <ol style="list-style-type: none"> 2. The Council recognises the need to boost the delivery of affordable housing in Birmingham and one of the key objectives of the Local Plan and Housing Strategy to deliver a step change in the provision of affordable housing including social housing. 3. Through the Birmingham Municipal Housing Trust, the Council has been the largest developer of social housing since 2009. We have already delivered around 3,000 new homes on our own land through the Birmingham Housing Municipal Trust since 2009 and will be working towards delivering more. |
| <p>BLPIO-201</p> | <p>IO Consultation Event - Sutton Cold</p> | | <p>06/12/22 09:55</p> | <p>Need a mix of housing including affordable housing, housing for families and retirement bungalows.</p> | <p>The Local Plan will seek to ensure that the city's identified housing needs. This includes meeting the need for affordable housing, housing suitable for families and housing for older people, as well the needs</p> |

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| | | | | | of other groups identified in the Housing and Economic Development Needs Assessment (April 2022). |
| BLPIO-252 | IO Consultation Event - Bham Lib | | 13/12/22 14:04 | More better quality housing and council housing with better energy efficiency. | The Plan will seek to deliver housing growth to meet the varied housing needs of the city which will include social/ affordable housing. Policy will be proposed to make new development be as energy efficient as possible. |
| BLPIO-256 | | West Midlands Housing Association Planning Consortium (WMHAPC) | 13/12/22 14:57 | Acknowledges Birmingham City Council's intention to consider the introduction of First Homes including the role that they have in the overall affordable housing mix. However, there is a concern over the introduction of First Homes including their implications on the delivery of the traditional forms of affordable housing throughout Birmingham. Type, size and tenure should be based on most up-to-date evidence taking into account relevant market signals but important that future policies do not impose a prescriptive dwelling size and tenure of affordable homes and needs to apply a flexible approach as reiterated at paragraph 8.54 of the HEDNA 2022. | It is acknowledged that policies will need to be sufficiently flexible to take account of site context and specifics. |

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| BLPIO-316 | | Langley Sutton Coldfield Consortium | 14/12/22 15:43 | Proposed policy changes specifically for older person provision would need to be supported by robust evidence and regard to site-specific considerations and viability. | Any proposed site allocations or policies for older persons housing will be supported by robust evidence. |
| BLPIO-325 | | Housebuilders Consortium (Barton Willmore) | 14/12/22 16:05 | Imperative that a range of housing is provided that is not skewed to one particular form of housing. Lack of family housing is unsustainable and could have potential negative effects on the City. | The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. |
| BLPIO-400 | Joanne Harding | Home Builders Federation | 28/12/22 16:34 | These will vary over the plan period and will be influenced by a number of different factors. Flexibility is required in planning policy. The HEDNA is a snapshot in time and other evidence should be considered. | It is acknowledged that policies need to be sufficiently flexible. |
| BLPIO-404 | Vita Group | Vita Group | 29/12/22 09:49 | <ol style="list-style-type: none"> 1. Build to rent can add to the choice of good quality rented accommodation and secure longer-term tenancies in the city but no evidence to suggest the lack of planning policy has prevented investment and | <ol style="list-style-type: none"> 1. Comment noted. Agree, that a specific Build to Rent policy may not be required. 2. Comment noted. A draft policy on co-living development will be prepared. |

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| | | | | <p>delivery of new build to rent homes in Birmingham so may not be necessary or too prescriptive.</p> <p>2. There is a need for co-living in Birmingham and a draft policy wording to <u>support</u> high quality co-living schemes would be welcomed. Suggest amendments to the draft co-living policy put forward by Icen in the HEDNA.</p> | |
| BLPIO-412 | Calthorpe Estates | | 29/12/22 14:20 | <p>Critical that a mix of homes is provided, including University leavers, key workers, families, students and older people. Important that policies are sufficiently flexible to reflect anticipated market cycles over the period of the Plan.</p> | <p>The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. It is acknowledged that policies will need to be sufficiently flexible.</p> |
| BLPIO-429 | Jon Morris | Acocks Green Focus Group | 29/12/22 15:54 | <p>Housing that caters for lower and higher income groups. Reduce in-commuting of higher income groups.</p> | <p>The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering</p> |

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| | | | | | for all incomes and ages is delivered, to meet the housing needs of the city. |
| BLPIO-481 | Ms Anna Hulme | St. Modwen Properties Plc | 03/01/23 11:02 | Given the historic under-delivery of family homes and affordable homes there should be greater emphasis on these, particularly in suburban and outlying areas of the city. Residential development land values are particularly high in central Birmingham and so delivery at high densities is needed to ensure that development is viable. This results in such schemes being primarily apartment led. Where housing numbers are exported into neighbouring authorities through the Duty to Cooperate, RPS consider these housing developments should be focussed on delivering family housing and affordable housing. | The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. |
| BLPIO-497 | Craig Rowbottom | Arup | 03/01/23 14:48 | <ol style="list-style-type: none"> 1. Benefits of retaining graduates by offering accommodation purpose built for that sector including and co-living and live/ work units should be investigated. 2. Benefit of Purpose Built Student Accommodation in | <ol style="list-style-type: none"> 1. The Plan will include a policy on co-living and live/ work units to ensure they meet the housing needs of the city, are appropriately located and provide a high quality of accommodation. 2. The Plan will provide policy on purpose built student |

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| | | | | reducing the take up of traditional family homes as HMOs. | accommodation to ensure sufficient supply of good quality accommodation which is provided in suitable and sustainable locations, is well designed and protects local amenity. |
| BLPIO-521 | | Druids Heath Consortium | 04/01/23 11:29 | Make sufficient sites available in order to deliver sufficient family housing. | The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. |
| BLPIO-553 | IO Consultation Event - Erdington | | 06/01/23 16:30 | <ol style="list-style-type: none"> 1. Too many hostels / HMOs and Council need to do more to tackle rogue landlords / HMOs and enforce against bad ones. 2. Not enough social housing and too much private rented. 3. New development should be better linked to services and facilities so local residents benefit e.g. schools, GP provision. | <ol style="list-style-type: none"> 1. The Council recognises that high concentrations of HMOs can be harmful to residential amenity and balanced communities and is committed to maintaining and creating thriving sustainable neighbourhoods. With this in mind, the City Council introduced a city-wide Article 4 Direction in relation to change of use from C3 dwellings to C4 HMOs in June 2020 followed by a stronger local planning policy on HMOs (DM11) through the Development Management in |

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| | | | | | <p>Birmingham Document December 2021 and a Supplementary Planning Document on HMOs in April 2022. With these three tools in place, the Council will be able to better manage the growth of HMOs across the city. Birmingham City Council has been granted permission by the Department of Levelling Up, Housing and Communities under the Housing Act 2004 to introduce a Selective Licensing Scheme for all private rented properties in 25 wards in the city, delivered through a team of 130 staff. The scheme will target wards where the private rented sector is above 20% of properties and there are high levels of deprivation and/or crime. The scheme will be the largest in the UK covering between 40,000 - 50,000 properties. It will last five years and come into force on 5 June 2023. This will give the City Council the powers to ensure that a suitable standard of accommodation is provided and the conditions of the license are met. The City Council is also exploring Additional Licensing (which relates to licensing for smaller HMOs that is not covered by</p> |
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| | | | | | <p>mandatory licensing). The proposed Additional Licensing Scheme will potentially cover 8,000 smaller HMOs across all 69 wards in Birmingham and last five years.</p> <p>2. The Council's latest Housing and Economic Development Needs Assessments (April 2022) evidences a significant need for social/affordable rented accommodation which the Local Plan will seek to address.</p> <p>3. The Plan will ensure that new development will be well served by existing or new infrastructure and accessible to local services and facilities by sustainable transport modes.</p> |
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Question 12 - How do you think we can increase the supply of affordable housing?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-111 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:07 | Challenge viability claims and engage in more joint developments, where provision of social housing is a requirement. | Where development proposals do not provide policy compliant amount of affordable housing, the City Council requires planning applications to be accompanied by a viability assessment. The Council undertakes an independent assessment of the developer's assessment, paid for by the applicant. The Council does challenge the assessment and have negotiated significant amounts of extra s106 contributions from that which was initially offered by applicants. |
| BLPIO-219 | IO Consultation Event - Northfield | | 08/12/22 11:39 | Look at existing vacant land, e.g. North Worcs Golf Club. Social housing could be provided there. | Vacant land has been explored and included where suitable in the housing supply. |
| BLPIO-320 | Paul Gilmour | Dale Farm | 14/12/22 15:48 | Build more houses. | The Plan will seek to deliver housing growth to meet the varied housing needs of the city which will include social/ affordable housing. |
| BLPIO-568 | IO Consultation | | 09/01/23 09:36 | Increase supply of all types of affordable housing and regular review | The Council recognises the need to boost the delivery of affordable housing in Birmingham and one of the key objectives of |

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| | Event - Ladywood | | | of people on the Council house waiting list. | the Local Plan and Housing Strategy to deliver a step change in the provision of affordable housing. Detail in relation to Birmingham's Housing Allocation Scheme can be found at Housing Allocation Scheme Birmingham City Council |
| BLPIO-586 | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:49 | Sceptical about including First Homes in this calculation but needs to be a tighter definition of affordable housing as many affordable homes are not actually affordable for many people. | Policy on affordable homes will need to comply with national policy and guidance. First Homes are the government's preferred discounted market tenure and national guidance requires local authorities to seek to adopt planning policies which require at least 25% of all affordable housing units delivered by developers through planning obligations. |
| BLPIO-133 | Mr David Carter | Tyler Parkes | 05/12/22 09:35 | Designation of land for a S.U.E. at Fox Hill would provide a significant contribution to the provision of affordable housing (up to 700 affordable homes). | Comment noted. |
| BLPIO-217 | IO Consultation Event - Yardley | | 08/12/22 11:31 | The council owns land that can be used for housing. | The Council owns a significant amount of land in the city and the Council's Corporate Plan commits us to using own land assets to deliver additional housing. We have already delivered around 3,000 new homes on our own land through the Birmingham Housing Municipal Trust since 2009 and will be |

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| | | | | | working towards delivering more. We have undertaken a detailed site search of our land holdings through the urban capacity work for the Local Plan to identify suitable opportunities for both housing and economic development. |
| BLPIO-265 | Unknown | Westside Business Improvement District | 13/12/22 15:46 | Supports work to see if higher densities are viable but must be fully evidenced. | The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. |
| BLPIO-285 | Mr Ed Barrett | Catesby Estates | 13/12/22 22:30 | Greater consideration will need to be given to greenfield development opportunities in order to meet targets as viability of brownfield sites fails to provide enough affordable housing. | Comments relating to viability are noted. |
| BLPIO-305 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:34 | Test the existing 35% affordable housing requirement but any increase must be fully evidenced to avoid developers running individual viability assessments in an attempt to deliver less. | The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. |
| BLPIO-450 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:05 | Affordable housing is expected to be delivered via S106 and existing targets are unlikely to be sufficient to meet | The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do |

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| | | | | the identified needs. Viability testing is required to determine the most appropriate affordable housing requirement. | not increase development costs to the point where development cannot or does not happen. |
| BLPIO-474 | | Midlands Land Portfolio Ltd | 30/12/22 15:11 | <ol style="list-style-type: none"> 1. An increase to the minimum housing requirement may be required to ensure that a sufficient supply of affordable housing is provided. 2. Viability testing is required to determine the most appropriate affordable housing requirement. | <ol style="list-style-type: none"> 1. The Housing and Economic Development Needs Assessment (April 2022) estimated the need for affordable housing over the plan period. The HEDNA considered that this would not point to a need for the Council to increase the Local Plan housing requirement above that suggested by the Standard Method. 2. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. |
| BLPIO-530 | | MEPC Limited | 04/01/23 16:20 | Affordable housing requirements should be flexible considered against other policy requirements when tested for viability. | Policies will be underpinned by evidence, comply with national policy and guidance and contain sufficient flexibility. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its collective policy requirements do not increase development |

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| | | | | | costs to the point where development cannot or does not happen. |
| BLPIO-142 | Mr John Pearce | Bloor Homes | 05/12/22 10:10 | Current lack of affordable housing due to the amount of apartment schemes that have been approved and built. Need to allocate more lower density family housing sites, such as at Frankley, will result in the delivery of more affordable housing. | The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-158 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:23 | By requiring that 50% of all new developments contain affordable housing—and then implementing that requirement rigorously! | The Council will test the viability of requiring a higher % of affordable housing than the current policy requirement of 35%. |
| BLPIO-166 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:07 | By requiring that a percentage (50%?) of all new developments contain affordable housing--and then enforcing that requirement rigorously! | As set out in the Issues and Options Document the Council will test whether a % higher than the current 35% policy is viable. |
| BLPIO-274 | IO Consultation Event - Moseley | | 13/12/22 16:09 | Currently creating suburbs that are unaffordable, e.g. Moseley. Involve neighbourhoods in delivering affordable housing e.g. community ownership models | The Council recognises the need to boost the delivery of affordable housing in Birmingham and one of the key objectives of the Local Plan and Housing Strategy to |

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| | | | | | deliver a step change in the provision of affordable housing. |
| BLPIO-291 | | Henley Investment Management Ltd | 14/12/22 11:29 | <ol style="list-style-type: none"> 1. 35% rarely viable with market-led developments. Should allow for off-site provision. 2. Tenure split should be flexible. 3. Build to rent sector should reflect national government policy recommendations. | <ol style="list-style-type: none"> 1. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. 2. It is acknowledged that policies need to be sufficiently flexible. 3. Any local policy on build to rent will comply with national policy. |
| BLPIO-331 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:24 | <ol style="list-style-type: none"> 1. 35% affordable provision is rarely viable with market led developments and should be based upon sound viability assessment. Should allow for offsite provision wherever possible. 2. Tenure split and type mix for affordable provision should be flexible. 3. Requirements for affordable provision within build to rent (BTR) schemes should reflect | <ol style="list-style-type: none"> 1. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its collective policy requirements do not increase development costs to the point where development cannot or does not happen. 2. It is acknowledged that policy will need to be sufficiently flexible to take account of site context and specifics. 3. First Homes are a national policy requirement, whilst the Local |

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| | | | | <p>national government policy. First Homes are not compatible with BTR for on-site provision and should not be a policy requirement of BTR development.</p> | <p>Authority can set out certain criteria relating to First Homes, they can not change the requirement for 25% of homes delivered through S16 to be First Homes, however, there will be circumstances where a cash sum is more appropriate than on-site provision.</p> |
| <p>BLPIO-467</p> | <p>Mr James Chatterton</p> | <p>William Davis Ltd</p> | <p>30/12/22 14:15</p> | <p>Affordable housing is expected to be delivered via S106 and existing targets are unlikely to be sufficient to meet the identified needs. Viability testing is required to determine the most appropriate affordable housing requirement.</p> | <p>The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen.</p> |
| <p>BLPIO-515</p> | | <p>Midland Land Ltd</p> | <p>04/01/23 10:36</p> | <p>Allocate sites that have less viability constraints, i.e. greenfield sites currently in the Green Belt.</p> | <p>Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document.</p> |
| <p>BLPIO-539</p> | <p>Mr David Joseph</p> | <p>Bloor Homes</p> | <p>05/01/23 10:20</p> | <p>Allocate sites that have less viability constraints, i.e. greenfield sites currently in the Green Belt.</p> | <p>Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document.</p> |

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| BLPIO-8 | Mr Lewis Lucas | | 04/11/22 08:23 | Build on the green belt. | Comment noted. |
| BLPIO-25 | Mr Joshua James | Severn Trent Water | 09/11/22 12:27 | No specific comments | Noted. |
| BLPIO-86 | Mr John Pearce | Bloor Homes | 01/12/22 12:13 | Build more family sized houses as City centre apartments do not provide sufficient affordable units for viability reasons. | The Council's latest Housing and Economic Development Needs Assessment (April 2022) evidences a need for all sizes of accommodation but the largest demand is for 2 and 3 bed properties. The Plan will seek to ensure an appropriate housing size, type and tenure of housing is delivered which meets the needs of the city. |
| BLPIO-197 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 16:57 | <ol style="list-style-type: none"> 1. Council's current target of 35% affordable housing is not being met. This needs to be challenged. 2. Overwhelming need for more good quality social housing. 3. The Council itself should become the land owners and developers of social housing for rent. | <ol style="list-style-type: none"> 1. Comment noted. A Whole Plan Viability Assessment will be undertaken to test the collective viability of the Local Plan policies. 2. The Council recognises the need to boost the delivery of affordable housing in Birmingham and one of the key objectives of the Local Plan and Housing Strategy to deliver a step change in the provision of affordable housing including social housing. |

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| | | | | | <p>3. Through the Birmingham Municipal Housing Trust, the Council has been the largest developer of social housing since 2009. We have already delivered around 3,000 new homes on our own land through the Birmingham Housing Municipal Trust since 2009 and will be working towards delivering more.</p> |
| <p>BLPIO-201</p> | <p>IO Consultation Event - Sutton Cold</p> | | <p>06/12/22 09:55</p> | <p>More social housing, and more shared ownership for single people + single families</p> | <p>The Local Plan will seek to ensure that the city's identified housing needs. This includes meeting the need for affordable housing (both rented and owned), housing suitable for families and single people, as well the needs of other groups identified in the Housing and Economic Development Needs Assessment (April 2022).</p> |
| <p>BLPIO-256</p> | | <p>West Midlands Housing Association Planning Consortium (WMHAPC)</p> | <p>13/12/22 14:57</p> | <p>Presently Policy TP31 seeks affordable housing contributions on sites of 15 dwellings or more but the NPPF (2021) defines major development as development which comprises of 10 or more dwellings, or more than 0.5 hectares. Lowering the threshold to 10 dwellings would increase the number of sites that deliver affordable housing. The Council could also justifiably test the adopted 35%</p> | <p>Comments noted. The Council will be testing whether a lower threshold of development and a higher % of affordable would be viable.</p> |

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| | | | | <p>threshold to see if a higher contribution is viable. A Rural Exception Policy could also increase the supply of affordable homes.</p> <p>Not just important to increase the supply of affordable housing but also to deliver the correct types and mix of affordable homes.</p> | |
| <p>BLPIO-325</p> | | <p>Housebuilders Consortium (Barton Willmore)</p> | <p>14/12/22 16:05</p> | <ol style="list-style-type: none"> 1. The consultation document misrepresents the acute need for affordable housing. The HEDNA report shows the actual need is 6,306 dwellings per annum. 2. The BDP is only delivering about half of the affordable housing required during this period. Delivering the full LHN of 7,136 dpa is therefore justified. 3. To achieve the full LHN allocate sites for housing with less viability issues. These sites are likely to be located beyond the city centre. | <ol style="list-style-type: none"> 1. The Issues and Options Document quotes the affordable housing need figure of 2,997 dpa but recognises that this excludes households already in accommodation. 2. There will be limits to the additional housing capacity that can be accommodated within the Birmingham boundary. Even if all the remaining Green Belt was allocated for development, it would be unlikely to meet the full LHN. 3. As above. |

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| <u>BLPIO-400</u> | Joanne Harding | Home Builders Federation | 28/12/22 16:34 | Viability testing is required to determine a deliverable affordable housing requirement. | The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. |
| <u>BLPIO-412</u> | Calthorpe Estates | | 29/12/22 14:20 | BLP must consider alternative forms of affordable provision, particularly focused on the delivery of dwellings for key workers. | The Plan will comply with national policy and guidance on affordable housing. |
| <u>BLPIO-429</u> | Jon Morris | Acocks Green Focus Group | 29/12/22 15:54 | Provide more social housing. Use Council owned land. | The Council owns a significant amount of land in the city and the Council's Corporate Plan commits us to using own land assets to deliver additional housing. We have already delivered around 3,000 new homes on our own land through the Birmingham Housing Municipal Trust since 2009 and will be working towards delivering more. We have undertaken a detailed site search of our land holdings through the urban capacity work for the Local Plan to identify suitable opportunities for both housing and economic development. |
| <u>BLPIO-497</u> | Craig Rowbottom | Arup | 03/01/23 14:48 | Welcome the commitment to investigate whether a higher level of affordable housing should be enshrined in policy but ascertain why | Comments welcomed and the suggestions raised will sought to be actioned. |

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| | | | | lower than desired rates have been achieved and whether some of the weighing of benefits of development should be recalibrated. | |
| BLPIO-521 | | Druids Heath Consortium | 04/01/23 11:29 | Allocate sites that have less viability constraints, i.e. greenfield sites currently in the Green Belt. | Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-553 | IO Consultation Event - Erdington | | 06/01/23 16:30 | Lack of affordable housing. Waiting lists and quality of the existing Council housing stock is terrible | The Council recognises that there is a need to boost the delivery of affordable housing in Birmingham and one of the key objectives of the Local Plan and Housing Strategy to deliver a step change in affordable housing provision. The Council's recently adopted Housing Strategy commits to delivering a comprehensive stock condition improvement programme of Council stock at a rate of 10% per year over the next 5 years. |

Question 13 - Should we have a policy with a simple split of affordable rent and affordable home ownership or a policy with a more detailed tenure split?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-54 | Mr Alex Jones | Gladman Retirement Living ltd | 23/11/22 15:09 | Simple split of tenure is most appropriate, in order to avoid an overly prescriptive and burdensome policy. Council should not seek affordable housing on specialist elderly accommodation that falls into Use Class C2 (as is currently the case), and this should be made explicit in any policy. Imbalance between affordable housing and market extra care units. | The HEDNA (April 2022) found a need for around 1,600 housing units with support (sheltered/retirement housing) – split between market and affordable housing 2020-2040 and a need for around 2,600 additional housing units with care (e.g., extra-care) – focussed on the affordable sector. |
| BLPIO-111 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:07 | The affordable housing / unit mix / tenure mix should be a strong determinant in the approval of schemes. | Comment noted. |
| BLPIO-320 | Paul Gilmour | Dale Farm | 14/12/22 15:48 | Simple split and leave the detailed tenure and housing mix to the planning process. The 10% affordable ownership & first homes are easily accommodated in the TP31 wording. | Comment noted. |

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| BLPIO-586 | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:49 | <ol style="list-style-type: none"> 1. Needs to be a target of number of homes for social rent in developments as well as an affordability target. 2. We would support a specific policy on building to rent including considerations about affordability. | <ol style="list-style-type: none"> 1. A housing mix and affordable housing policy will provide the means to ensure an appropriate housing mix is delivered in the city. 2. Comment noted. |
| BLPIO-73 | Miss Natasha Styles | Planning Bureau | 29/11/22 10:14 | <p>The evidence underpinning affordable housing requirements must be robust and viability tested. Viability of specialist housing for older people is more finely balanced. Any Policy should also recognise exemptions to on site affordable home ownership, discount market sales and first homes for specialist housing for older people due to those sites being delivered on smaller sites and in central locations.</p> | <p>The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. The characteristics of different development will be considered.</p> |
| BLPIO-158 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:23 | <p>Keep it simple, but the Council must itself invest in social housing where a mix of tenure types can be implemented.</p> | <p>Through the Birmingham Municipal Housing Trust, the Council has been the largest developer of social housing since 2009. We have already delivered around 3,000 new homes on our own land through the Birmingham Housing Municipal Trust since 2009 and will be working towards delivering more.</p> |

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| BLPIO-166 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:07 | Keep it simple, but the Council itself must invest in social housing to ensure a mix of all tenure types. | Comment noted. Through the Birmingham Housing Municipal, the Council has delivered around 3,000 new homes on our own land since 2009, a large proportion of these being social rented homes, and will be working towards delivering more. |
| BLPIO-467 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:15 | A flexible approach is required to allow applicants to undertake their own assessments of the most appropriate tenure mix. | It is acknowledged that policies will need to be sufficiently flexible to take account of site context and specifics. |
| BLPIO-539 | Mr David Joseph | Bloor Homes | 05/01/23 10:20 | Policy should be flexible, reflect national policy, evidence based and viability tested. | It is acknowledged that policies will need to be sufficiently flexible to take account of site context and specifics. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. |
| BLPIO-17 | Janelle Kolas | | 04/11/22 09:51 | We need a focus on council-owned homes. | Comment noted. |
| BLPIO-133 | Mr David Carter | Tyler Parkes | 05/12/22 09:35 | Flexibility to allow for changing economic circumstances during the plan period. Allow for detailed discussions on a site-by-site basis allowing for innovative solutions. | It is acknowledged that policies need to be sufficiently flexible. |

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| BLPIO-217 | IO Consultation Event - Yardley | | 08/12/22 11:31 | Private Rent is unaffordable | <p>Across the city the private rented sector has grown and plays an important and wide ranging role in supporting a range of households across the spectrum from the highly skilled to benefit claimants. The Council's latest Housing and Economic Development Needs Assessment (April 2022) has found there are gaps between private lower quartile rents and Local Housing Allowance rates in the city and for smaller (1/2 bed) and larger (4+ beds) properties, which suggests challenges for those on lower incomes and their ability access the private rental market.</p> |
| BLPIO-240 | Mrs Michaela Moore | Hammerson - Bullring and Grand Central | 13/12/22 12:49 | <p>A policy that dictates the type of housing in a particular area may act as a prohibitor to growth in an increasingly challenging market and this would not be supported by Hammerson.</p> | <p>It is acknowledged that policy on housing type, size and tenure will need to be sufficiently flexible.</p> |
| BLPIO-265 | Unknown | Westside Business Improvement District | 13/12/22 15:46 | <p>The split of affordable units provided on each site should be individual to the circumstances. Against policies prescribe housing mix (type/tenure/size).</p> | <p>The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the</p> |

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| | | | | | city. It is acknowledged that policies will need to be sufficiently flexible to take account of site context and specifics. |
| BLPIO-305 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:34 | The split of affordable units provided on each site should be individual to the circumstances that exist at the time and which are site related. Prescribed housing mix types/thresholds are not supported. | The Council's Housing and Economic Development Needs Assessment (April 2022) evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. It is acknowledged that policies will need to be sufficiently flexible. |
| BLPIO-450 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:05 | A flexible approach is required to allow applicants to undertake their own assessments of the most appropriate tenure mix. | It is acknowledged that policies will need to be sufficiently flexible to take account of site context and specifics. |
| BLPIO-474 | | Midlands Land Portfolio Ltd | 30/12/22 15:11 | A flexible approach is required to allow applicants to undertake their own assessments of the most appropriate tenure mix. | The policy will contain sufficient flexibility and comply with national policy and guidance on affordable homes. |
| BLPIO-8 | Mr Lewis Lucas | | 04/11/22 08:23 | No affordable rent/ownership in the city centre. No more cheap housing, just larger quality homes. | The Council's latest Housing and Economic Development Needs Assessment (April 2022) evidences a significant need for both social/ affordable rented housing and a need for affordable ownership in the city. |

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| | | | | | One of the key objectives of the Local Plan and Housing Strategy is to deliver a step change in the provision of affordable housing to meet the identified need. The HEDNA also evidences a need for all sizes of accommodation but the largest demand is for 2 and 3 bed properties. The Plan will seek to ensure an appropriate housing mix is delivered which meets the housing needs of the city. |
| BLPIO-25 | Mr Joshua James | Severn Trent Water | 09/11/22 12:27 | No specific comments | Noted. |
| BLPIO-197 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 16:57 | <ol style="list-style-type: none"> 1. Council's current target of 35% affordable housing is not being met. This needs to be challenged. 2. Overwhelming need for more good quality social housing. 3. The Council itself should become the land owners and developers of social housing for rent. | <ol style="list-style-type: none"> 1. Comment noted. A Whole Plan Viability Assessment will be undertaken to test the collective viability of the Local Plan policies. 2. The Council recognises the need to boost the delivery of affordable housing in Birmingham and one of the key objectives of the Local Plan and Housing Strategy to deliver a step change in the provision of affordable housing including social housing. 3. Through the Birmingham Municipal Housing Trust, the Council has been |

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| | | | | | <p>the largest developer of social housing since 2009. We have already delivered around 3,000 new homes on our own land through the Birmingham Housing Municipal Trust since 2009 and will be working towards delivering more.</p> |
| BLPIO-256 | | <p>West Midlands Housing Association Planning Consortium (WMHAPC)</p> | <p>13/12/22 14:57</p> | <p>The WMHAPC suggests a split which accommodates all affordable tenures whilst allowing flexibility to respond to local needs and viability. Should also take into account the need to provide First Homes for at least 25% of all affordable housing units delivered through planning obligations.</p> | <p>Comments on preferred approach to affordable split. As indicated in the Issues and Options account will be taken of the need to provide First Homes.</p> |
| BLPIO-400 | <p>Joanne Harding</p> | <p>Home Builders Federation</p> | <p>28/12/22 16:34</p> | <p>Viability testing is required to determine an appropriate tenure split. Policy should be flexible and be consistent with national policy.</p> | <p>The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. It is acknowledged that policies need to be sufficiently flexible.</p> |
| BLPIO-412 | <p>Calthorpe Estates</p> | | <p>29/12/22 14:20</p> | <p>Affordable housing should maintain flexibility to enable specific considerations to be taken into account. As such it is not considered</p> | <p>Comment noted. The policy will contain sufficient flexibility and comply with national policy and guidance on affordable housing.</p> |

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| | | | | that a more detailed tenure split is appropriate. | |
| <u>BLPIO-429</u> | Jon Morris | Acocks Green Focus Group | 29/12/22 15:54 | Support wider types of housing such as community land trusts and self-build housing. | Community led housing and self-build housing is supported by the Council where appropriate. |

Question 14 - How do you think we can prevent the loss of family housing to other forms of housing?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-111 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:07 | Support the city wide Article 4 direction on conversion of Class C3 to HMO. Support forms of development which relieve pressure for HMOs (e.g. student housing, older people housing, social care). | Support noted. |
| BLPIO-320 | Paul Gilmour | Dale Farm | 14/12/22 15:48 | Demand for HMO's is a reflection of the under provision of housing generally in the city. | The Plan will seek to deliver housing growth to meet the varied housing needs of the city which will include social/ affordable housing. |
| BLPIO-548 | Mark Sullivan | CPRE Warwickshire | 05/01/23 12:12 | It is not clear why the Article 4 Direction has not been effective at reducing conversions of family housing to student HMOs. Support the policy but need to ensure that it is effective. | An Article 4 Direction is not a moratorium on HMOs but provides the Council greater control over HMO growth and assists in preventing harmful concentrations from arising. The policy's effectiveness will be monitored. |
| BLPIO-586 | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:49 | We support limits to HMOs. Propose increasing limits to their numbers in a geographic area to prevent excessive concentrations. | The Council recognises that high concentrations of HMOs can be harmful to residential amenity and balanced communities and is committed to maintaining and creating thriving sustainable neighbourhoods. With this in mind, the City Council introduced a city- |

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| | | | | | wide Article 4 Direction in relation to change of use from C3 dwellings to C4 HMOs in June 2020 followed by a stronger local planning policy on HMOs (DM11) through the Development Management in Birmingham Document December 2021 and a Supplementary Planning Document on HMOs in April 2022. With these three tools in place, the Council will be able to better manage the growth of HMOs across the city. |
| BLPIO-158 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:23 | By implementing planning restrictions on an area-by-area basis, as is done in commercial sectors. Renewed emphasis and enforcement of city-wide planning policies to prevent the sub-division or conversion of family homes, combined with policies to encourage new development to include provision suitable for older people to encourage them to move out of family homes. | While the Council has introduced a city-wide HMO Article 4 Direction and more stringent policy on HMO development, a policy to prevent the loss of family housing (Use Class C3) to help retain families in the city and ensure the housing needs of families can be met will be proposed in the Plan. The Plan will also consider how it can best meet provision for older peoples housing through allocating sites and or/ criteria based policy. |
| BLPIO-166 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:07 | Planning restrictions on an area-by-area basis as with commercial sectors. City-wide policies to prevent the subdivision or conversion of family homes, especially since such conversions do not always fulfil the City's strategic housing needs. | While the Council has introduced a city-wide HMO Article 4 Direction and more stringent policy on HMO development, a policy to prevent the loss of family housing (Use Class C3) to help retain families in the city and ensure the housing needs of |

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| | | | | | families can be met will be proposed in the Plan. |
| BLPIO-274 | IO Consultation Event - Moseley | | 13/12/22 16:09 | More planning enforcement to investigate breaches of planning control. | The City Council is committed to providing an effective planning enforcement service. In order to undertake effective investigations, it is essential that there is co-operation between the City Council departments and other agencies, such as the Police, Environment Agency, HMRC and the Health and Safety Executive. The City Council will continue to develop these relationships in the future in order to make best use of all our available resources. The City Council will investigate all reports about alleged breaches of planning control, except those reported anonymously, to determine whether a breach has as a matter of fact occurred, and if it has, will then determine the most appropriate course of action, mindful to the basic principles of enforcement. Further detail can be found in the Council's Local Enforcement Plan Birmingham Local Enforcement Plan Birmingham City Council |
| BLPIO-539 | Mr David Joseph | Bloor Homes | 05/01/23 10:20 | Consider Article 4 Directions where supported by evidence and on an appropriate geographical scale. | The City Council introduced a city-wide Article 4 Direction in relation to change of use from C3 dwellings to C4 HMOs in June 2020. |

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| <p>BLPIO- 8</p> | <p>Mr Lewis Lucas</p> | | <p>04/11/22 08:23</p> | <ol style="list-style-type: none"> 1. Toughen up rules on HMOs. 2. Petition Central Government to scrap 'exempt' HMOs. | <ol style="list-style-type: none"> 1. The City Council introduced a city-wide Article 4 Direction in relation to change of use from C3 dwellings to C4 HMOs in June 2020 followed by a stronger local planning policy on HMOs (DM11) through the Development Management in Birmingham Document December 2021 and a Supplementary Planning Document on HMOs in April 2022. With these three tools in place, the Council will be able to better manage the growth of HMOs across the city. 2. The Council's Overview and Scrutiny Committee undertook a review of SEA in Birmingham in 2021. The full report was published and approved by the City Council in December 2021 Exempt Accommodation Report Birmingham City Council. The report includes a wide range of recommendations such as the continuation of the multi-disciplined, cross department team that is dedicated to SEA beyond the pilot, mainstream funding to resource the team and lobbying for change to introduce national standards for accommodation. With regards to the issues caused by the |
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| | | | | | <p>occupants of Supported Exempt Accommodation, Birmingham has introduced a new Inspection Team to improve the quality and standard of SEA in the city. We are also rolling out a new Quality Standard and encouraging all providers to sign up to this. As well as improving property standards and support, we are tackling community and neighbourhood issues such as waste management and working in partnership with West Midlands Police to investigate and prosecute anti-social behaviour, crime and other community safety issues. There is currently a lack of regulation nationally to be able to fully control the growth of this type of accommodation, but we are working closely with government departments to improve national legislation and policy in this area.</p> |
| BLPIO-25 | Mr Joshua James | Severn Trent Water | 09/11/22 12:27 | No specific comments | Noted. |
| BLPIO-288 | Naomi Paul | Co-Ordinator, Perry Barr | 14/12/22 08:41 | Support proposal for policy to prevent the loss of family housing. | Support noted. |

| | | Constituency Housing Action Group | | | |
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| BLPIO-361 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:16 | Emerging evidence that the Article 4 Direction applied across the city has led to displaced HMO operators looking to expand their operations into neighbouring authorities, including Walsall. As such the impact of restrictions on the loss of family housing on the housing market across the wider area should be examined before any further restrictions are introduced. | Comment noted. |
| BLPIO-404 | Vita Group | Vita Group | 29/12/22 09:49 | <ol style="list-style-type: none"> 1. Delivery of new build to rent, co-living and PBSA schemes in the right places will relieve the pressure on the existing housing stock in the city as the supply of higher quality rent accommodation increases. 2. The loss of family homes to sub-standard and poorly managed HMOs will continue if the Plan fails to facilitate the delivery of alternative forms of housing and offering existing and new | Comments noted. |

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| | | | | residents a choice of better-quality housing. | |
| BLPIO-429 | Jon Morris | Acocks Green Focus Group | 29/12/22 15:54 | Follow existing policy approach especially for suburban development and restrict conversions. | While the Council has introduced a city-wide HMO Article 4 Direction and more stringent policy on HMO development, a policy to prevent the loss of family housing (Use Class C3) to help retain economically active families in the city and ensure the housing needs of families can be met will be proposed in the Plan. |
| BLPIO-17 | Janelle Kolas | | 04/11/22 09:51 | Prevent students from living in family homes that have been turned in HMOs. | The Council cannot mandate where students live but the Local Plan can guide where new purpose built student accommodation should be located and manage the growth and distribution of new HMOs. The Council cannot require that existing HMOs be returned to family use, but the provision of purpose built student accommodation could help to alleviate pressure on private rental housing and reduce the risk of family housing being converted to HMOs. |
| BLPIO-133 | Mr David Carter | Tyler Parkes | 05/12/22 09:35 | 1. Land at the proposed Fox Hill S.U.E would help address pressures leading to the loss of family accommodation elsewhere. | 1. Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |

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| | | | | <p>2. Advocate new policy for specific provision for the elderly on site allocations and windfall developments above a specified threshold and where qualifying criteria (such as access to local shopping and public transport) are met.</p> | <p>2. Specific policy on housing for older people will be included in the Plan for consultation. Site allocations for older persons housing will be considered.</p> |
| <p>BLPIO-265</p> | <p>Unknown</p> | <p>Westside Business Improvement District</p> | <p>13/12/22 15:46</p> | <p>Provision of PBSA within Westside could result in other student accommodation reverting back to family homes.</p> | <p>The Plan will provide policy on purpose built student accommodation to ensure sufficient supply of good quality accommodation is provided in suitable and sustainable locations, is well designed and protects local amenity.</p> |

Question 15 & 16 - Should we have a policy which requires a percentage of older persons housing on residential developments Should or allocate sites specifically for older persons housing?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-54 | Mr Alex Jones | Gladman Retirement Living ltd | 23/11/22 15:09 | <p>Support principle of requiring a percentage of older persons housing on residential developments but only above a certain threshold. The policy must ensure that different forms of accommodation are provided on different sites, such as age restricted general market housing, retirement living and sheltered housing, extra care housing/housing with care, residential care homes and nursing homes with the chosen type evidenced by a local need assessment. However, our experience is that a generic application of for example encouraging specialist housing on strategic sites is ineffective as a landowners/house builder are not compelled to sell a parcel(s) of their development site for that use.</p> <p>Council should consider allocating sites specifically for older persons housing using evidence based approach to direct where most is</p> | Comments noted. The suggested policy options will be explored. |

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| | | | | needed. Without allocations, there is an over-reliance on windfalls. | |
| BLPIO-111 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:07 | Should be a Lifetime Homes policy for all new housing development, designed for people of all ages. Dedicated sites for older people housing can be very positive, and may be of a very high quality, intended for downsizing wealthy couples, as well as affordable. | The suggested policy approaches will be considered. |
| BLPIO-320 | Paul Gilmour | Dale Farm | 14/12/22 15:48 | No need for specific policy or allocation of sites. | Comment noted. |
| BLPIO-586 | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:49 | Mixed neighbourhoods are often best in terms of having cohesive communities that can support each other but has to be balanced against the need for older persons feeling safe and secure. | The Plan will seek to meet the varied housing needs of the city while maintaining sustainable, mixed and balanced communities. |
| BLPIO-133 | Mr David Carter | Tyler Parkes | 05/12/22 09:35 | This should be pro-actively considered on allocated sites. Sites which are close to local services well served by public transport should be favoured. There is potential for such accommodation to be provided at the Fox Hill S.U.E. | Specific policy on housing for older people will be included in the Plan for consultation. Site allocations for older persons housing will be considered. |

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| BLPIO-265 | Unknown | Westside Business Improvement District | 13/12/22 15:46 | Dependant on need, demonstrated in supporting evidence. Large developments with an element of older persons housing, could result in a more balanced “place” for residents and allow the older generation to live as part of a community as opposed to being isolated. | Comment noted. Any proposed site allocations will be supported by evidence. |
| BLPIO-285 | Mr Ed Barrett | Catesby Estates | 13/12/22 22:30 | Allocating sites specifically for older people is an appropriate approach. Kempson Avenue, Wylde Green (CFS Ref 1b4210) would be a highly suitable location for an older person’s housing development. | Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-305 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:34 | Allocation of sites for older persons housing could potentially be supported if demonstrated by evidence. Large developments with an element of older persons housing, could result in a more balanced “place” for residents and allow the older generation to live as part of a community as opposed to being isolated within a specific retirement village type situation. | Comments noted. Any proposed site allocations will be supported by evidence. |
| BLPIO-450 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:05 | RPS is generally supportive of providing homes that are suitable to meet the needs of older people and | It is acknowledged that policies will need to be sufficiently flexible to take account of site context and specifics. |

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| | | | | disabled people. RPS does not consider that requiring a proportion of large housing sites to be available for older person housing is appropriate. If a policy were to be introduced then RPS recommend that it is sufficiently flexible and takes into consideration the location of the site, the topography of the area, the accessibility of the area and the viability of the development. | |
| BLPIO-474 | | Midlands Land Portfolio Ltd | 30/12/22 15:11 | RPS does not consider that requiring a proportion of large housing sites to be available for older person housing is appropriate. If a policy were to be introduced then RPS recommend that it is sufficiently flexible and takes into consideration the location of the site, the topography of the area, the accessibility of the area and the viability of the development. | It is acknowledged that policies will need to be sufficiently flexible to take account of site context and specifics. |
| BLPIO-73 | Miss Natasha Styles | Planning Bureau | 29/11/22 10:14 | <ol style="list-style-type: none"> 1. Define fully older person's housing need for the whole plan period 2. Allocate sites specifically to meet the housing needs of older people | <ol style="list-style-type: none"> 1. The Plan will refer to the need identified in the Housing and Economic Development Needs Assessment (April 2022). 2. The Council will explore allocating sites and/ or requiring a proportion of |

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| | | | | <p>3. Includes a stand-alone policy supporting the delivery of schemes that meet the housing needs of older people</p> <p>4. Ensure that the viability assessment still to be undertaken includes a number of typologies that includes older person's housing.</p> | <p>housing sites of a certain scale to deliver housing for older people.</p> <p>3. A specific policy on housing for older people will be prepared.</p> <p>4. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. The characteristics of different development will be considered.</p> |
| BLPIO-158 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:23 | Allocating sites specifically for older people should only be in response to a proposal from a specialist provider. The new Extra-care developments seem to be working well. | Comment noted. |
| BLPIO-166 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:07 | Provision of good-quality and appropriate housing for older residents in residential developments might encourage older people to move out of family homes they have outgrown, thus freeing them up for the next generation of families. Allocating sites for a specific sub-group of the population runs the risk of being discriminatory | Comments noted. The Plan will seek to deliver mixed and sustainable neighbourhoods and ensure that a wide choice of housing sizes, types and tenures, catering for all incomes and ages is delivered, to meet the housing needs of the city. |

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| | | | | and unfair. Mixed neighbourhoods breed tolerance and understanding. | |
| BLPIO-291 | | Henley Investment Management Ltd | 14/12/22 11:29 | BCC should base any policy requirement upon appropriate evidence. Level of wheelchair use at less than 2% of the population so suggested target of 10-15% wheelchair specific design therefore appears unjustified. | Any policy on wheelchair accessible dwellings will be robustly evidenced and justified and in accordance with national guidance. |
| BLPIO-331 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:24 | Policy should support the principle of development for housing designed and operated for older people, which may include wheelchair accessibility. | Specific policy on housing for older people will be included in the Plan and the draft policy will be subject to consultation through the plan-making process. |
| BLPIO-406 | | Churchill Retirement Living | 29/12/22 10:56 | The housing needs of older people are distinctly different from those of the wider market and so a specific policy approach is required, as in the example provided. Such policies should encourage the delivery of specialist forms of accommodation for older people and not be criteria led. Developers should not be required to demonstrate need. Viability of any future policy approach is also a key consideration. | Specific policy on housing for older people will be included in the Plan and the draft policy will be subject to consultation through the plan-making process. The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. |

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| BLPIO-467 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:15 | RPS is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. RPS does not consider that requiring a proportion of large housing sites to be available for older person housing is appropriate. If a policy were to be introduced then RPS recommend that it is sufficiently flexible and takes into consideration the location of the site, the topography of the area, the accessibility of the area and the viability of the development. | It is acknowledged that policies will need to be sufficiently flexible to take account of site context and specifics. |
| BLPIO-539 | Mr David Joseph | Bloor Homes | 05/01/23 10:20 | Question 15 - only include a policy where there is strong justification. Any policy should include flexibility and take account of the circumstances of the development site. | Any policy will be evidenced, comply with national policy and guidance and contain sufficient flexibility. |
| BLPIO-8 | Mr Lewis Lucas | | 04/11/22 08:23 | No | Noted |
| BLPIO-25 | Mr Joshua James | Severn Trent Water | 09/11/22 12:27 | No specific comments | Noted. |

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| BLPIO-197 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 16:57 | Yes | Noted |
| BLPIO-361 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:16 | Need to consider a policy which either requires or at the very least supports the delivery of specialist homes to meet the needs of older persons. | Comment noted. Policy on housing for older people will be included in the Plan and the draft policy will be subject to consultation through the plan-making process. |
| BLPIO-400 | Joanne Harding | Home Builders Federation | 28/12/22 16:34 | Question 15: follow the M4 standards set out in national policy. Flexible approach required rather than specifying requirements for large sites. Question 16: Support the allocation of sites but discussion and negotiation with landowners required. | The Plan will be subject to a Whole Plan Viability Assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to the point where development cannot or does not happen. It is acknowledged that policies need to be sufficiently flexible. Any sites proposed for allocation will be discussed with landowners. |
| BLPIO-412 | Calthorpe Estates | | 29/12/22 14:20 | Do not consider specific allocations for older peoples housing would be effective. Rather, policies should contain sufficient flexibility for older persons housing to be brought forward on a range of sites, and enabling the older person themselves to choose to be anywhere where the right accessible product can | This comment will be considered when determining whether to allocate any sites specifically for older peoples housing. |

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| | | | | be delivered. Calthorpe do not consider that there should be any distinction made between sites allocated for open market housing, or for older persons housing. | |
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Question 17 - What should the policy be on purpose built student accommodation?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-17 | Janelle Kolas | | 04/11/22 09:51 | Full time students must live only in purpose built accommodation which should be made affordable via rent caps. | The Council cannot mandate where students live but the Local Plan can provide policy on purpose built student accommodation including requirements for the provision of affordable student housing which will be explored. |
| BLPIO-265 | Unknown | Westside Business Improvement District | 13/12/22 15:46 | Westside lends itself to more PBSA. | The Plan will provide policy on purpose built student accommodation to ensure sufficient supply of good quality accommodation is provided in suitable and sustainable locations, is well designed and protects local amenity. |
| BLPIO-111 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:07 | New PBSA should be accessible to universities, considering travel distances. | Comment noted. |
| BLPIO-311 | | Olympian | 14/12/22 15:27 | Further provision of PBSA should be encouraged throughout the City, creating an overall more balanced community. Would support a similarly worded Policy to TP33. 224 Broad Street is highly accessible by | The Plan will provide policy on purpose built student accommodation to ensure sufficient supply of good quality accommodation is provided in suitable and sustainable locations, is well designed and protects local amenity. |

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| | | | | sustainable transport modes from many of the University campuses | |
| BLPIO-320 | Paul Gilmour | Dale Farm | 14/12/22 15:48 | No change – selly oak provides centralised student facilities and is a sustainable solution. | Comment noted. |
| BLPIO-548 | Mark Sullivan | CPRE Warwickshire | 05/01/23 12:12 | See question 14 | Comment noted |
| BLPIO-158 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:23 | Encourage such accommodation to be within certain proximity of educational establishment. Where possible, encourage universities to share accommodation in ‘student villages’ | The Local Plan will continue to encourage purpose built student accommodation to be located in close proximity to the educational establishment it serves. Question how the idea of sharing accommodation would work if students require accommodation at the same time. |
| BLPIO-166 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:07 | Encourage such accommodation to be within proximity of educational establishments, and where possible, to be shared by different universities. | The Local Plan will continue to encourage purpose built student accommodation to be located in close proximity to the educational establishment it serves. Not sure how the idea of sharing accommodation would work if students require accommodation at the same time. |
| BLPIO-291 | | Henley Investment Management Ltd | 14/12/22 11:29 | Co-living should be encouraged and facilitated through the Plan. | The Council will develop a planning policy for co-living. |

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| BLPIO-331 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:24 | Setting a limit on the density of students living in an area is not a workable proposition. PBSA should be developed where the market considers it desirable to do so, subject to all other relevant planning considerations. Provision of PBSA would reduce market demand for HMO type accommodation. | The Plan will provide policy on purpose built student accommodation to ensure sufficient supply of good quality accommodation is provided in suitable and sustainable locations, is well designed and protects local amenity. |
| BLPIO-539 | Mr David Joseph | Bloor Homes | 05/01/23 10:20 | No comment. | Noted |
| BLPIO-576 | IO Consultation Event - Stirchley | | 09/01/23 12:14 | PBSA - need to ensure it is affordable | The Local Plan will include a policy on purpose built student accommodation and a requirement for an element of affordable student accommodation will be explored. |
| BLPIO-8 | Mr Lewis Lucas | | 04/11/22 08:23 | PBSA should be encouraged in all areas of the city centre, near universities and near good transport links to universities. Should be high density and high rise | Policy on PBSA will seek to ensure that there is a sufficient supply of good quality accommodation in suitable and sustainable locations. |
| BLPIO-25 | Mr Joshua James | Severn Trent Water | 09/11/22 12:27 | No specific comments | Noted. |

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| BLPIO-361 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:16 | The policy approach which seeks to locate purpose-built student accommodation in and near the University Campus's should be maintained. This ensure such developments are well located in relation to the institutions which they serve. | Comment noted. |
| BLPIO-404 | Vita Group | Vita Group | 29/12/22 09:49 | Imperative to ensure sufficient good quality PBSA. Policy framework does not need to alter much from the current BDP approach in Policy TP33. | Comment noted. |
| BLPIO-412 | Calthorpe Estates | | 29/12/22 14:20 | BCC should ensure the policy framework supports the delivery of good quality PBSA and attuned to the growth and expansion of the institutions. The Calthorpe estate is home to two expanding university institutions, and the BLP has to offer flexibility to be able to respond to harness their growth. | Policy on PBSA will seek to ensure that there is a sufficient supply of good quality accommodation in suitable and sustainable locations. |
| BLPIO-429 | Jon Morris | Acocks Green Focus Group | 29/12/22 15:54 | Need a balance between concentrating student accommodation in certain areas and dispersing them but with good transport links to the educational establishment. | Comments noted. |

Question 18 - Where should new gypsy and traveller sites be located?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| <u>BLPIO-17</u> | Janelle Kolas | | 04/11/22 09:51 | Near hospitals. | Gypsy and traveller sites will be located in accordance with national policies and guidance and an up-to-date Accommodation Assessment (GTAA) |
| <u>BLPIO-217</u> | IO Consultation Event - Yardley | | 08/12/22 11:31 | Hay Mills Park often has travellers and an alternative must be sought. | Gypsy and traveller sites will be located in accordance with national policies and guidance and an up-to-date Accommodation Assessment (GTAA) |
| <u>BLPIO-158</u> | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:23 | Ideally, such sites should have the potential to be integrated into existing neighbourhoods. | Gypsy and traveller sites will be located in accordance with national policies and guidance and an up-to-date Accommodation Assessment (GTAA) which is to be carried out prior to preferred options. |
| <u>BLPIO-166</u> | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:07 | Ideally, such sites should be integrated into existing neighbourhoods. | Gypsy and traveller sites will be located in accordance with national policies and guidance and an up-to-date Accommodation Assessment (GTAA) which is to be carried out prior to preferred options. |

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| BLPIO-354 | Patrick Jervis | Lichfield District Council | 20/12/22 17:36 | Lichfield need assistance to meet Gypsy and Traveller needs but BCC cannot assist. | Gypsy and traveller sites will be located in accordance with national policies and guidance and an up-to-date Accommodation Assessment (GTAA) which is to be carried out prior to preferred options. Given Birmingham's likely requirements for gypsy and traveller accommodation as well as significant pressures to accommodate all other housing needs, it is unlikely that Birmingham could meet a proportion of Lichfield's unmet needs for gypsy and traveller pitches. |
| BLPIO-539 | Mr David Joseph | Bloor Homes | 05/01/23 10:20 | No comment. | Noted |
| BLPIO-111 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:07 | In accordance with national guidance. | Gypsy and traveller sites will be located in accordance with national policies and guidance and an up-to-date Accommodation Assessment (GTAA) which is to be carried out prior to preferred options. |
| BLPIO-368 | Rosamund Worrall | Historic England | 21/12/22 13:00 | Historic England would be seeking an approach which considers any harm to the significance of heritage assets, or | Gypsy and traveller sites will be located in accordance with national policies and guidance and an up-to-date |

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| | Unknown | | | their setting, and including unknown buried archaeology in line with NPPF requirements and Historic England specific advice on site allocations. | Accommodation Assessment (GTAA) which is to be carried out prior to preferred options. |
| BLPIO-8 | Mr Lewis Lucas | | 04/11/22 08:23 | 86 Boulton Road, Small Heath, B10 0BB. | The site suggestion will be investigated. |
| BLPIO-25 | Mr Joshua James | Severn Trent Water | 09/11/22 12:27 | No specific comments | Noted. |
| BLPIO-348 | Unknown | South Staffordshire District Council | 20/12/22 17:13 | South Staffs recently published an updated Gypsy and Traveller Accommodation Assessment but have a shortfall of suitable sites. Ask that BCC that options to see if there is a supply of suitable new public sites in BCC's area that could contribute towards meeting a proportion of SSDC's unmet needs for pitches should be properly considered. | Gypsy and traveller sites will be located in accordance with national policies and guidance and an up-to-date Accommodation Assessment (GTAA) which is to be carried out prior to preferred options. Given Birmingham's likely requirements for gypsy and traveller accommodation as well as significant pressures to accommodate all other housing needs, it is unlikely that Birmingham could meet a proportion of SSDC's unmet needs for gypsy and traveller pitches. |

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| BLPIO-361 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:16 | New gypsy and traveller sites should be sustainably located within the city with good access to a range of services and facilities. It is recommended that sites located near known traveller routes should also be prioritised. | Gypsy and traveller sites will be located in accordance with national policies and guidance and an up-to-date Accommodation Assessment (GTAA) which is to be carried out prior to preferred options. |
| BLPIO-387 | Carl Mellor | Dudley Metropolitan Borough Council | 21/12/22 16:11 | Dudley MBC will keep under review any potential cross boundary issues | Gypsy and traveller sites will be located in accordance with national policies and guidance and an up-to-date Accommodation Assessment (GTAA) which is to be carried out prior to preferred options. BCC will continue to actively work with Dudley MBC and other neighbours of any cross boundary matters arising. |

Question 19 - What type and scale of development should Health Impact Assessments apply to?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-111 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:07 | Look at best practice elsewhere. | The Local Plan will ensure that there are links to health issues such as obesity through policies which encourage physical activity including walking and cycling as well as sports and play space provision as well as ensuring health impacts of major applications are fully considered by developers and stakeholders through Health Impact assessments. |
| BLPIO-320 | Paul Gilmour | Dale Farm | 14/12/22 15:48 | Large scale development that are reliant on CIL. | The Local Plan will ensure that there are links to health issues such as obesity through policies which encourage physical activity including walking and cycling as well as sports and play space provision as well as ensuring health impacts of major applications are fully considered by developers and stakeholders through Health Impact assessments. |
| BLPIO-484 | | MKF Investments | 03/01/23 11:40 | HIAs should only be required for larger, strategic sites. | The Local Plan will ensure that there are links to health issues such as obesity through policies which encourage physical activity including walking and cycling as well as sports and play space provision as well as ensuring health impacts of major |

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| | | | | | applications are fully considered by developers and stakeholders through Health Impact assessments. |
| BLPIO-438 | Imogen Forster | St Joseph Homes Limited | 30/12/22 10:04 | HIAs should apply to all major developments. | The Local Plan will ensure that there are links to health issues such as obesity through policies which encourage physical activity including walking and cycling as well as sports and play space provision as well as ensuring health impacts of major applications are fully considered by developers and stakeholders through Health Impact assessments. |
| BLPIO-450 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:05 | Do not support a requirement for HIAs. Broader health policies should be applied instead. If a requirement is applied then it should only apply to the largest developments and existing methodologies should be applied such as the Health Urban Development Unit Rapid Health Impact Assessment Tool. | The Local Plan will ensure that there are links to health issues such as obesity through policies which encourage physical activity including walking and cycling as well as sports and play space provision as well as ensuring health impacts of major applications are fully considered by developers and stakeholders through Health Impact assessments. |
| BLPIO-474 | | Midlands Land Portfolio Ltd | 30/12/22 15:11 | Do not support a requirement for HIAs. Broader health policies should be applied instead. If a requirement is applied then it should only apply to the largest developments and existing methodologies should be applied such | The Local Plan will ensure that there are links to health issues such as obesity through policies which encourage physical activity including walking and cycling as well as sports and play space provision as well as ensuring health impacts of major |

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| | | | | as the Health Urban Development Unit Rapid Health Impact Assessment Tool. | applications are fully considered by developers and stakeholders through Health Impact assessments. |
| BLPIO-73 | Miss Natasha Styles | Planning Bureau | 29/11/22 10:14 | Purpose built housing for older people reduces burdens on health and social care and a higher threshold for HIAs would be more appropriate for such housing. | Thresholds for applying the need to provide an HIA will be addressed following consultation with Public Health Team. |
| BLPIO-158 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:23 | All developments over 5 dwellings. | The Local Plan will ensure that there are links to health issues such as obesity through policies which encourage physical activity including walking and cycling as well as sports and play space provision as well as ensuring health impacts of major applications are fully considered by developers and stakeholders through Health Impact assessments. |
| BLPIO-166 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:07 | All developments over 5 dwellings. | The Local Plan will ensure that there are links to health issues such as obesity through policies which encourage physical activity including walking and cycling as well as sports and play space provision as well as ensuring health impacts of major applications are fully considered by developers and stakeholders through Health Impact assessments. |

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| BLPIO-467 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:15 | Do not support a requirement for HIAs. Broader health policies should be applied instead. If a requirement is applied then it should only apply to the largest developments and existing methodologies should be applied such as the Health Urban Development Unit Rapid Health Impact Assessment Tool. | The Local Plan will ensure that there are links to health issues such as obesity through policies which encourage physical activity including walking and cycling as well as sports and play space provision as well as ensuring health impacts of major applications are fully considered by developers and stakeholders through Health Impact assessments. |
| BLPIO-539 | Mr David Joseph | Bloor Homes | 05/01/23 10:20 | HIAs should be considered on a site by site basis. There should not be a blanket requirement for them in local policy. | The Local Plan will ensure that there are links to health issues such as obesity through policies which encourage physical activity including walking and cycling as well as sports and play space provision as well as ensuring health impacts of major applications are fully considered by developers and stakeholders through Health Impact assessments. |
| BLPIO-8 | Mr Lewis Lucas | | 04/11/22 08:23 | Don't know. | Noted. |
| BLPIO-25 | Mr Joshua James | Severn Trent Water | 09/11/22 12:27 | No specific comments | Noted. |

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| BLPIO-197 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 16:57 | All development should be subject to HIA, including assessing any limitations on the 15 or 20 minute neighbourhood concept. | The Local Plan will need to ensure that there are links to health issues such as obesity through policies which encourage physical activity including walking and cycling as well as sports and play space provision as well as ensuring health impacts of major applications are fully considered by developers and stakeholders through Health Impact assessments. |
| BLPIO-400 | Joanne Harding | Home Builders Federation | 28/12/22 16:34 | HIA shouldn't be required. Policies should broadly support healthy development instead. | The Local Plan will need to ensure that there are links to health issues such as obesity through policies which encourage physical activity including walking and cycling as well as sports and play space provision as well as ensuring health impacts of major applications are fully considered by developers and stakeholders through Health Impact assessments. |
| BLPIO-553 | IO Consultation Event - Erdington | | 06/01/23 16:30 | Need a city-wide strategy to tackle obesity | The Local Plan will ensure that there are links to health issues such as obesity through policies which encourage physical activity including walking and cycling as well as sports and play space provision as well as ensuring health impacts of major applications are fully considered by developers and stakeholders through Health Impact assessments. |

Question 20 - Do you feel we have missed any policy opportunities to help the city achieve net zero?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-60 | Ms Libby Harris | Birmingham Friends of the Earth | 24/11/22 19:05 | <p>We welcome this section on climate change and it should be the overriding theme that guides all aspects of the Plan.</p> <p>We expect to see consistent policies to guide investment into energy efficiency and development of renewable zero carbon energy sources during the period of the Plan.</p> | <p>Comments are noted and support is welcomed. The policies within the plan will be consistent with the net zero carbon aspiration.</p> |
| BLPIO-134 | Mr David Carter | Tyler Parkes | 05/12/22 09:39 | <p>Addressing Climate Change is of fundamental importance and as prospective developers of land we would accept that we should adhere to the best practices.</p> | <p>Comments are noted and support is welcomed.</p> |
| BLPIO-170 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:14 | <p>Carbon neutral policies for existing buildings/neighbourhoods is needed. Source of funding and capacity building need to be specified as well.</p> | <p>Comments are noted. The role of the Local Plan does not extend to addressing the issue of retrofitting. However, the use of a carbon off setting policy to provide some funding for retrofitting is being explored and the City Council's Route to Zero Carbon team are undertaking a number of projects to address retrofitting.</p> |

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| BLPIO-203 | IO Consultation Event - Sutton Cold | | 06/12/22 11:33 | Improving affordability and energy efficiency of housing and offices, mandating new homes to have solar panels and support sustainable green energy company. | Comments are noted. The Birmingham Local Plan will set policies on energy efficiency and renewable energy. |
| BLPIO-306 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:46 | The council need to provide evidence for the need to achieve net zero by 2030. The rise in development cost will either reduce the desire to build new developments or pass the cost onto the end user. | Comments are noted. However the City Council has declared a climate emergency and needs to progress ahead of the national timeframe in order to achieve this. All of the policies will be subject to viability testing. |
| BLPIO-423 | | | 29/12/22 15:29 | <ul style="list-style-type: none"> • Further emphasis on blue-green infrastructure/corridors in developments, and protect blue-green infrastructure from developments. Promote Habitat connectivity. • Making buildings adaptable so they can be reused. • Encourage the redevelopment of contaminated land • Land/groundwater quality should be considered with surface water impacts in baseline study of the plan making process. | <p>Consider including further emphasis on the green/blue infrastructure, including making pace for flood plains.</p> <p>Considering the carbon cost of maintaining green spaces will be explored as the policy develops.</p> |

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| BLPIO-475 | | Midlands Land Portfolio Ltd | 30/12/22 15:20 | Net zero policies are unnecessary as building regulations prescribe the standards that should be achieved. | Comments are noted, however, the City Council has committed to achieving net zero by 2030 and will therefore need to achieve net zero new build ahead of the national timeframe. |
| BLPIO-551 | Mr Antony Whitehead | Our Town | 05/01/23 16:10 | There is great potential within the city to retrofit existing buildings rather than demolish and rebuild them. Greening of tall buildings is not possible. | Comments are noted. We are required to demonstrate that the policies within the Local Plan are financially viable. A sustainability study has been commissioned to support the development of the sustainability policies within the Local Plan, including the approach to embodied carbon. |
| BLPIO-555 | IO Consultation Event - Erdington | | 06/01/23 16:42 | <ol style="list-style-type: none"> 1. Consultee does not support CAZ. 2. Consultee suggests that the Council to mandate new builds to have solar panels and provide support for widescale refurbishment for existing properties. | <ol style="list-style-type: none"> 1. The CAZ sits outside of the remit of the Local Plan. 2. The Local Plan will set policy on sustainability requirements but we can not mandate a particular approach to carbon reduction, each development needs to be able to meet the policy requirements in the most appropriate way. |
| BLPIO-112 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:11 | District heating networks. No policy on improving existing stock. | The future role of District heat networks within the city will be considered as part of the Local Plan. BEIS are also undertaking work nationally on heat networks which will |

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| | | | | | inform the policy approach in the Local Plan. The Route to Zero team are looking at programmes to retrofit existing stock. |
| BLPIO-212 | IO Consultation Event - Northfield | | 08/12/22 09:56 | <ol style="list-style-type: none"> 1. Consultee thinks the plan making process needs to be speeded up. 2. Consultee think that stronger enforceable policies are needed to fulfil the Net Zero Commitment. | <ol style="list-style-type: none"> 1. Comments are noted, Government are undertaking a package of reforms which are targeted at speeding up plan making. 2. The Birmingham Local Plan will include policies to support the delivery of net zero carbon. |
| BLPIO-224 | | Aston Villa Football Club | 13/12/22 11:17 | The Club support enhanced sustainability measures. Developments should prioritise brownfield sites. Characteristics of brownfield sites, including the betterment over the existing situation/abnormal development costs, should be accounted when assessing applicable standards for the development. | Comments are noted and support is welcomed. The Local Plan will prioritise the reuse of brownfield land in accordance with the requirements of the NPPF. The Local Plan will also be subject to a whole plan viability assessment. |
| BLPIO-321 | Paul Gilmour | Dale Farm | 14/12/22 15:51 | No I think the policy goes too far. Central government plan for net zero by 2050 was sustainable and achievable but only with significant economic and policy down sides. | Comments are noted. Whilst the national target for net zero is 2050, Birmingham City Council has a target to be net zero carbon by 2030 or as soon thereafter as a just transition allows and the Local Plan must support the delivery of this. |

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| BLPIO-369 | <p>Rosamund Worrall</p> <p>Unknown</p> | <p>Historic England</p> | <p>21/12/22 13:01</p> | <p>The opportunities for synergy between heritage and other draft Plan elements including the declared climate emergency are not recognised in the draft plan at this stage.</p> | <p>Comments are noted.</p> <p>Consider expanding objective 1 to include repurposing the historic environment and capture its embodied carbon.</p> <p>The Local Plan will consider life cycle carbon as it progresses.</p> |
| BLPIO-485 | <p>Ross Franklin</p> | <p>Birmingham Airport Limited</p> | <p>03/01/23 11:52</p> | <ol style="list-style-type: none"> 1. Solar developments may require reflectivity assessment for glint and glare impacts near the airport and extended centrelines of the runway. 2. Consult Birmingham Airport on wind turbine developments within 30km radius or in the vicinity of the aerodrome. 3. Sites being used for the handling, compaction, treatment and/or disposal of household and/or commercial wastes must consider bird/wildlife hazard. | <p>Agree with comments.</p> |
| BLPIO-588 | <p>Councillor Julien Pritchard</p> | <p>Green Party Group</p> | <p>09/01/23 16:52</p> | <ol style="list-style-type: none"> 1. Comparative carbon appraisals for any planning policies or SPG 2. Anyone seeking to develop new fossil fuel extraction needs to | <ol style="list-style-type: none"> 1. A sustainability study has been commissioned which will provide carbon comparisons for policy options. |

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| | | | | <p>show how the proposal will be carbon negative</p> <ol style="list-style-type: none"> 3. Multipurposed roof (for renewable energy/biodiversity) 4. Prioritise building reuse/retrofitting over demolition 5. 'Fabric first' approach in building design process | <ol style="list-style-type: none"> 2. Comment noted. 3. The use of multi purposed roofs will be encouraged. 4. The issue of embodied carbon will be considered as part of the Local Plan - the sustainability study will provide evidence to demonstrate what the options are for this. 5. The sustainability policies will promote a fabric first approach. |
| BLPIO-48 | Mr Mike Mounfield | Colmore BID | 21/11/22 15:55 | No | Noted |
| BLPIO-68 | Mr Chris Brammeier | Warwickshire County Council Lead Local Flood Authority | 28/11/22 10:48 | Good spatial location and density of development is need to complement with sustainable developments to reduce usage of cars. | Comments are noted. The Local Plan will consider the accessibility of sites which are allocated for development and it will sit alongside the Birmingham Transport Plan which aims to achieve significant modal shift away from the private car during the plan period. |
| BLPIO-149 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:51 | No | Noted |

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| BLPIO-161 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:37 | Carbon neutral policies for existing buildings/neighbourhoods is needed. Source of funding, capacity building and carbon cost of demolition need to be specified as well. | Comments are noted. The Birmingham Plan will also need to consider how it addresses embodied carbon and how this fits with national proposals for considering embodied carbon. |
| BLPIO-233 | STEPHEN LYNE | | 13/12/22 12:07 | Achieving net zero by 2030 need to be one of the starting point of the new local plan. | Comments are noted. The Local Plan will be instrumental in supporting the City in achieving its net zero aspirations. |
| BLPIO-257 | | West Midlands Housing Association Planning Consortium (WMHAPC) | 13/12/22 15:09 | Council to be wary of potential viability issues arise from requiring all developments to be zero carbon. | Comments are noted and support is welcomed. The Birmingham Plan will undergo a whole plan viability assessment to ensure that policies are collectively viable. |
| BLPIO-269 | Unknown | Westside Business Improvement District | 13/12/22 15:52 | The council need to provide evidence for the need to achieve net zero by 2030. The rise in development cost will either reduce the desire to build new developments or pass the cost onto the end user. | Comments are noted, however, the City Council as a commitment to be net zero carbon by 2030 and in order to achieve this we need to progress more quickly than the national approach. The policy will be viability tested. |
| BLPIO-326 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:13 | BCC need to clarify net zero goals and the means to achieve net zero by 2030. | Comments are noted. The Local Plan's contribution to achieving net zero will be clarified as the plan develops. |

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| BLPIO-362 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:19 | The proposed policy changes within the document appear to be comprehensive. Walsall Council is supportive of the City's aspirations to address the climate emergency. | Comments are noted and support is welcomed. |
| BLPIO-413 | Calthorpe Estates | | 29/12/22 14:28 | Flexible policy needed to balance open space provision, affordable homes, zero-carbon and viability. | Comments are noted. Viability will be assessed both through the Sustainability study and the whole plan viability assessment. |
| BLPIO-430 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:01 | Detailed design guidance required covering matters such as building orientation, car charging, localised heat networks, attractive walking routes, using vegetation to combat heat. Embodied energy calculations for new development. | Comments are noted. This is addressed within the City's Design Guide SPD and will be further addressed as we prepare Design Codes for the City. Consideration is being given to introducing a policy to require applicant to submit details relating to embodied carbon. |
| BLPIO-498 | Craig Rowbottom | Arup | 03/01/23 14:50 | Consider the 'Reduce, Restore, Remove' and 'The Green and Thriving Neighbourhoods Guidebook' when planning for climate change. Setup a local low carbon offset fund for new developments that cannot achieve net zero. Life-cycle carbon assessments for new/refurbishment projects. | Comments are noted and support is welcomed. The City Council is running a separate project looking at the potential to introduce 15 minute Neighbourhoods through Our Future City Plan. The Local Plan could include provision for an offsetting fund as part of a low carbon policy and the viability of this is being |

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| | | | | | <p>explored. This would help to address the need for large scale retrofit across the city.</p> <p>The options for a policy on embodied carbon are also being explored.</p> <p>Passivehaus is considered to be too restrictive for a Local Plan policy - however, it could be one approach to delivering low carbon homes and meeting or exceeding any policy requirement.</p> |
| BLPIO-143 | Mr John Pearce | Bloor Homes | 05/12/22 10:10 | There are a number of interlocking policy objectives that are sufficient in leading developments down the net zero route. Thus, a specific policy is not necessary. | Comments are noted. |
| BLPIO-187 | Gwyn James | Kier Highways | 05/12/22 16:20 | The Net Zero ambition is not adequately reflected in the contract documents for re-procurement of the Highway Maintenance PFI. Also by the time the Plan is adopted (Summer 2026) there isn't much time for it to have an impact on the 2030 target. Changes need to be brought in sooner than that if the target is to be met. | Comments are noted however, the Highways PFI contract sits outside of the Local Plan process. |

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| BLPIO-279 | IO Consultation Event - Moseley | | 13/12/22 16:25 | Support aspiration to achieve net zero development through retrofitting existing properties. | Comments are noted and support is welcomed. |
| BLPIO-394 | Mr Richard Forbes | Canal and Rivers Trust (Planning Manager) | 28/12/22 12:44 | Para 5.15: Include water source heat pumps as part of the mix of low carbon heating systems (which is applicable for developments alongside waterways) | Comments are noted and support is welcomed. The Birmingham Plan will include reference to water source heat pump in appropriate locations alongside the other range of technologies for providing low carbon heating and cooling. |
| BLPIO-436 | Becky Clarke | BCC Lead Local Flood authority | 30/12/22 09:27 | <p>The increase frequency of significant storms in the past few years raises the question of how can the BLP can predict how national climate change assessments will impact developments in Birmingham. As a result of the frequency of intense rainfall events, Birmingham LLFA request that developers model a 1 in 500 year storm against their proposed drainage infrastructure to mimic a greater than design storm event.</p> <p>The LLFA should be given the opportunity to look at how Policy TP6 of the current BDP can improve policy relating to residual flood risk mitigation to manage the risks associated with the more extreme</p> | Comments welcomed. We will update Policy TP6 in consultation with the LLFA. |

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| | | | | rainfall events experience in the city, and consider whether we should assess the 1 in 1000 year rainfall event for all new developments in anticipation of future climate change allowance increases. | |
| BLPIO-452 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:23 | Net zero policies are unnecessary as building regulations prescribe the standards that should be achieved. | Comments are noted, however, the City Council has committed to achieving net zero by 2030 and will therefore need to achieve net zero new build ahead of the national timeframe. |
| BLPIO-456 | Ben Simm | National Highways | 30/12/22 12:43 | Setup measures according to the National Highways Net Zero Plan to encourage modal shift away from cars. Setup standards to require developers to provide access to alternative forms of fuel including EV charging points. | Comments are noted and support is welcomed. The City's Parking SPD addresses electric vehicle charging and the City Council are currently rolling out a network of publicly accessible charge points across the city. |
| BLPIO-468 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:33 | Net zero policies are unnecessary as building regulations prescribe the standards that should be achieved. | Comments are noted, however, the City Council has committed to achieving net zero by 2030 and will therefore need to achieve net zero new build ahead of the national timeframe. |
| BLPIO-540 | Mr David Joseph | Bloor Homes | 05/01/23 10:52 | The greatest opportunities are in improvements to the existing housing | Comments are noted however there is a limit to what the Local Plan can do to |

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| | | | | stock. Additional standards should not be applied to new build developments. | address existing stock. Consideration is being given to a carbon off setting fund. |
| BLPIO-560 | IO Consultation Event - Perry Barr | | 06/01/23 17:03 | Timing of CAZ with Covid pandemic was wrong | The CAZ sits outside of the Local Plan remit. |
| BLPIO-577 | IO Consultation Event - Stirchley | | 09/01/23 12:22 | Strategic measures are needed to promote energy efficiency city-wide. | The Birmingham Local Plan will set out policies on energy efficiency and renewable energy. The Council's Route to Zero Carbon team are looking at programmes to retrofit existing properties. |

Question 21 - How should we encourage all developersto deliver net zero carbon development

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| <u>BLPIO-112</u> | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:11 | Apply BREEAM to all developments. | Policies for BREEAM, energy efficiency and renewable energy will be reviewed as part of the Local Plan update with a view to supporting the achievement of the Coty's commitment to be net zero carbon by 2030. |
| <u>BLPIO-321</u> | Paul Gilmour | Dale Farm | 14/12/22 15:51 | Building regs and the future homes standard will ensure this with not need for additional policy. Existing policies should be more stringent in terms of implementation. New Zero by 2030 is unachievable goal and will negatively affect the economy and transport. | Comments are noted, however BCC has committed to being net zero carbon by 2030 or as soon thereafter as a just transition allows and therefore needs to achieve net zero new development ahead of the national timetable. |
| <u>BLPIO-441</u> | Imogen Forster | St Joseph Homes Limited | 30/12/22 10:18 | Developers should be encouraged to deliver net zero carbon development with a toolkit being recommended as the best method. Viability needs to be considered and CIL/S106 should be relaxed where it could compromise the achievement of net zero carbon development. | Comments are noted, work is on-going at the WMCA level to look at best practice for delivering low-carbon and this will inform the preparation of the Birmingham Plan. The Local Plan will be subject to a whole plan viability assessment to ensure that it is viable. |

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| BLPIO-569 | IO Consultation Event - Ladywood | | 09/01/23 09:38 | More renewable energy measures in new-build but also retrofitting of existing properties | The Birmingham Local Plan will set out policies on energy efficiency and renewable energy. The Council's Route to Zero Carbon Team are looking at retrofit programmes. |
| BLPIO-588 | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:52 | <ol style="list-style-type: none"> 1. More emphasis should be place on improving energy efficiency of existing homes. 2. Concept of energy zones can be used to create 2-tier standard for carbon reduction. | <ol style="list-style-type: none"> 1. The Local Plan will push energy efficiency standards as far as possible within the confines of viability. 2. Energy zones are something that might be mandated by Government. Any carbon reduction policies in the Local Plan would apply city-wide. |
| BLPIO-74 | Miss Natasha Styles | Planning Bureau | 29/11/22 10:16 | <p>Council's policy requirements should align with the national government's target of achieving Net Zero by 2050, so that it is more pragmatic and achievable.</p> <p>The council need to consider other factors like rising building cost when delivering net zero, when seeking net zero from new developments.</p> | The City Council are committed to achieving net zero carbon ahead of the national target and this declaration was made in June 2019. A whole plan viability assessment will be undertaken to ensure that the Local Plan policy requirements are collectively deliverable. |
| BLPIO-279 | IO Consultation Event - Moseley | | 13/12/22 16:25 | <ul style="list-style-type: none"> • Need to elevate guidance in Parking SPD on electric vehicle charging points into development plan policy. | Comments are noted. This will be considered in the development of the transport policies within the Birmingham Local Plan. |

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| | | | | <ul style="list-style-type: none"> Short of skilled contractors to deliver sustainable construction. | With regard to the skills shortage, there are a number of programmes nationally and within the Region to help alleviate this problem. These programmes will support the implementation of the Birmingham Local Plan. |
| BLPIO-452 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:23 | Follow national standards within building regulations. | Comments are noted, however, the City Council has committed to achieving net zero by 2030 and will therefore need to achieve net zero new build ahead of the national timeframe. |
| BLPIO-468 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:33 | Follow national standards within building regulations. | Comments are noted, however, the City Council has committed to achieving net zero by 2030 and will therefore need to achieve net zero new build ahead of the national timeframe. |
| BLPIO-540 | Mr David Joseph | Bloor Homes | 05/01/23 10:52 | Building regulations are sufficient. There is no need for a local policy that would go beyond these standards. | Comments are noted however the City Council has a target to be net zero by 2030 and the changes to Building Regulations do not deliver this. The low carbon policy within the Local Plan will be supported by a sustainability study to look at exactly how it is defined and measured. The viability of the policy will be assessed both through the sustainability study and also as part of the whole plan viability assessment. |

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| BLPIO-48 | Mr Mike Mounfield | Colmore BID | 21/11/22 15:55 | Apply BREEM standards to all developments. | Comments are noted, the City Council already requires BREEAM on relevant development. |
| BLPIO-149 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:51 | Adopt more rigorous building standards (e.g., Building with Nature). | Comments are noted and support for building with nature is welcomed. |
| BLPIO-161 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:37 | Need to make developer realise the consequences of not complying with the net zero objective. | Comments are noted. |
| BLPIO-269 | Unknown | Westside Business Improvement District | 13/12/22 15:52 | Incentivise net zero developments will CIL/s106/affordable housing contribution reduction. | Comments are noted however, policies will be viability tested to ensure that they are affordable alongside S106 and CIL requirements including affordable housing. |
| BLPIO-362 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:19 | Through policy requirements with viability evidence. | Comments are noted and support is welcomed. The Birmingham Plan will be subject to a whole plan viability assessment to ensure that policies are collectively viable. |
| BLPIO-401 | Joanne Harding | Home Builders Federation | 29/12/22 09:40 | Follow national standards and building regulations rather than setting more ambitious targets in local policy. | Comments are noted, however, Birmingham has a commitment to be net zero carbon by 2030 and will therefore need to achieve net zero new build ahead of the national target date. |

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| BLPIO-413 | Calthorpe Estates | | 29/12/22 14:28 | Policy will need to be clear on the hierarchy of 'asks' of a development to ensure deliverability. | Comments are noted. Viability will be assessed both through the Sustainability study and the whole plan viability assessment. |
| BLPIO-430 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:01 | Improve workforce skills. Include training condition on large new developments. | The city Council planning team work closely with the Employment Action Team to secure employment and training opportunities for local people as part of new developments. Consideration is being given as to whether the policy approach can be more stringent in this area. |
| BLPIO-486 | | MKF Investments | 03/01/23 11:54 | Do not introduce a policy that goes beyond national requirements as this could affect the viability of development. | Comments are noted, however, the City Council has a commitment to be net zero carbon by 2023 and in order to achieve this it needs to progress ahead of the national timeframe. The viability of policies will be tested both through the Sustainability study and the whole plan viability assessment. |
| BLPIO-498 | Craig Rowbottom | Arup | 03/01/23 14:50 | Clarify the scope of net zero (energy only or all operational energy) and plan to decarbonise existing heat networks. Incorporate energy usage intensity (EUI) into policy to reduce consumption. | Comments are noted. The Preferred Options will set out more detail on what net zero means in the Local Plan context. The City's Route to Zero carbon team are working on a project to decarbonise the existing heat networks within the City. |

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| BLPIO-60 | Ms Libby Harris | Birmingham Friends of the Earth | 24/11/22 19:05 | <ul style="list-style-type: none"> • Prioritise 'Fabric first' approach and renewable energy sources and insist on Passivehaus. • Heat network can diverge some resources into new infrastructure, and the source of heat would be important, the city should not be locked into burning waste. | <p>Comments are noted. The Local Plan can not require Passivehaus, it can only set energy efficiency standards.</p> <p>The Government are currently undertaking a lot of work on heat network zones, these networks would need to be based on low carbon energy sources. If heat network zones are mandated BCC would need to implement this national requirement.</p> |
| BLPIO-134 | Mr David Carter | Tyler Parkes | 05/12/22 09:39 | Realistically, this should be driven by nationally-prescribed standards. | Comments are noted however, in order to achieve net zero carbon by 2030 the City will need to progress more quickly than the national requirements. |
| BLPIO-170 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:14 | Developers have to believe in the merits of net zero, or it will become a tick-box to be got round rather than delivered. Offer incentives for design and developments that exceed net-zero requirements; impose such stringent penalties across the board for non-compliance that it is not financially worth it. | Comments are noted. Any non compliance with an adopted policy will be addressed through the planning enforcement system. |
| BLPIO-241 | Mrs Michaela Moore | Hammerson - Bullring and Grand Central | 13/12/22 12:50 | Support policies with robust evidence. Climate change policies need to be flexible, as ability to | Comments are noted and support is welcomed. The Birmingham Plan will be subject to whole plan viability assessment |

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| | | | | comply with the sustainable construction guidelines varies accordingly with site condition/location. | to ensure that the policies are collectively viable. |
| BLPIO-423 | | | 29/12/22 15:29 | Incentivise through green incentives/tax breaks. | Comments are noted, however, tax breaks are outside of the remit of the Local Plan. |
| BLPIO-475 | | Midlands Land Portfolio Ltd | 30/12/22 15:20 | Follow national standards within building regulations. | Comments are noted, however, the City Council has committed to achieving net zero by 2030 and will therefore need to achieve net zero new build ahead of the national timeframe. |
| BLPIO-531 | | MEPC Limited | 04/01/23 16:36 | National standards should apply unless there is strong evidence to suggest that higher standards should be applied and these have been subject to viability testing. | Comments are noted however, the City Council has an ambition to be net zero by 2030 and therefore needs to progress more quickly than national standards. The policy will be subject to viability testing. |

Question 22 - How can we ensure that the principles on waste management and resource efficiency are addressed by new development?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-60 | Ms Libby Harris | Birmingham Friends of the Earth | 24/11/22 19:05 | <ul style="list-style-type: none"> • Source of heat for heat networks must not be burning waster. • Phase out Tyseley Incinerator and build no new incinerator | <p>The Government are currently undertaking a lot of work on heat network zones, these networks would need to be based on low carbon energy sources. If heat network zones are mandated BCC would need to implement this national requirement.</p> <p>The future of the Tyseley will be considered as part of the City's waste strategy.</p> |
| BLPIO-134 | Mr David Carter | Tyler Parkes | 05/12/22 09:39 | This should be addressed by the review of current policy, and it's success is determined by the council's ability to support waste management services. | Comments are noted. |
| BLPIO-170 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:14 | Pay attention to the enforcement on existing properties as well. Plans for extensions do not currently cover bin storage. | Comments are noted. Policies can not be retrospectively applied to existing building. |
| BLPIO-423 | | | 29/12/22 15:29 | <ul style="list-style-type: none"> • Strategic assessment is needed for proposed growth levels and for improvements needed by sewerage provider | Comments are noted. The IDP will consider all aspects of infrastructure including drainage. |

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| | | | | <p>to support such growth. Improvement works should be included in the Infrastructure Delivery Plan.</p> <ul style="list-style-type: none"> • WCS with WFD impact assessments is needed • opportunities for waste management/resource efficiency: Green building designs | |
| BLPIO-112 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:11 | Developers to submit waste management proposals as condition, discharge with evidence of compliance on completion. | Comments are noted. This will be considered as part of the waste policy. |
| BLPIO-321 | Paul Gilmour | Dale Farm | 14/12/22 15:51 | Covered by existing local plan policies. | Comments are noted. |
| BLPIO-369 | Rosamund Worrall Unknown | Historic England | 21/12/22 13:01 | Historic England notes the proposed policy changes and supports the approach set out in BP2 of p.28 of the Issues and Options document. | Comments are noted and support is welcomed. |
| BLPIO-569 | IO Consultation Event - Ladywood | | 09/01/23 09:38 | Improve the consistency of waste management across the city and scrape booking system at recycling centres. Handle the problem of flytipping. | Comments are noted however these issues sit outside the remit of the Birmingham Local Plan. |

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| BLPIO-588 | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:52 | <ol style="list-style-type: none"> 1. Prioritise re-use of buildings. 2. Combined Heat and Power plants could potentially be powered with bio-methane sourced from Anaerobic Digestion | <ol style="list-style-type: none"> 1. The issue of embodied carbon will be considered as part of the Local Plan - the sustainability study will provide evidence to demonstrate what the options are for this. 2. The waste study will look at these these issues and inform policy development in this area. |
| BLPIO-279 | IO Consultation Event - Moseley | | 13/12/22 16:25 | Need better provision of waste and recycling facilities in new and existing developments. | Comments are noted, this will be considered in the development of waste policies. |
| BLPIO-540 | Mr David Joseph | Bloor Homes | 05/01/23 10:52 | No comment. | Noted |
| BLPIO-564 | IO Consultation Event - Perry Barr | | 06/01/23 17:11 | Needs to be focusing on illegal dumping by factories and individuals - particularly in rivers | <p>The Environment Agency deals with pollution of water and land. You can report waste crime anonymously to Crimestoppers, such as dumping large amounts of waste illegally.</p> <p>Crimestoppers</p> <p>Report crime online</p> <p>Telephone: 0800 555 111</p> |

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| | | | | | 24-hour service |
| <u>BLPIO-48</u> | Mr Mike Mounfield | Colmore BID | 21/11/22 15:55 | Application of circular economy principles to the design of building lifecycles to extend building life and promote reuse/recycling. | The Birmingham Local Plan will set policy on low carbon developments and consider how we assess life cycle carbon. |
| <u>BLPIO-149</u> | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:51 | Adopt more rigorous building standards (e.g., Building with Nature). | Comments are noted and support for more rigorous standards is welcomed. |
| <u>BLPIO-161</u> | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:37 | Pay attention to the enforcement on existing properties as well. Also need to take waste more seriously across the City - extensions and alterations do not always adequately address waste and recycling. | Comments are noted. |

Question 23 - Should we introduce higher water efficiency standards?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
|--------------------------|-----------------|------------------------|-------------------|---|--|
| BLPIO-21 | Mr Joshua James | Severn Trent Water | 09/11/22 12:20 | <p>Support the use of water efficient design and the optional higher building regulations target of 110 litres per person per day. Recommend the following wording:</p> <p><i>New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.</i></p> <p>Supporting Text:</p> <p>National Planning Policy Framework (July 2018) Paragraph 149 states:</p> <p>“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, costal change, water</p> | Comments are noted. The suggested text will be considered when drafting the relevant policy. |

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| | | | <p>supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”</p> <p>This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency</p> | |
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| | | | | <p>classed the Severn Trent region as Seriously Water Stressed –link.</p> <p>We recommend that all new developments consider:</p> <ul style="list-style-type: none"> • Single flush siphon toilet cistern and those with a flush volume of 4 litres. • Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute. • Hand wash basin taps with low flow rates of 4 litres per minute or less. • Water butts for external use in properties with gardens. | |
| BLPIO-321 | Paul Gilmour | Dale Farm | 14/12/22 15:51 | No standards should be set by central government. | Comments are noted. |
| BLPIO-588 | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:52 | Support higher water efficiency standards and better use of grey water and rainwater which would also assist in reducing strain on | Support noted. |

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| | | | | sewage systems and associated flooding. | |
| BLPIO-9 | Mr Lewis Lucas | | 04/11/22 08:27 | Too expensive. Should be decided nationally. | Comments are noted. |
| BLPIO-48 | Mr Mike Mounfield | Colmore BID | 21/11/22 15:55 | Yes | Noted |
| BLPIO-68 | Mr Chris Brammeier | Warwickshire County Council Lead Local Flood Authority | 28/11/22 10:48 | Yes | Noted |
| BLPIO-149 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:51 | Yes | Noted |
| BLPIO-161 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:37 | Rainwater harvesting should be mandatory in all new developments, and to make sure that existing regulations to align with it. | Comments are noted and support is welcomed. |
| BLPIO-269 | Unknown | Westside Business Improvement District | 13/12/22 15:52 | No, this is adequately covered by Building Regulations. | Comments are noted. |

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| BLPIO-401 | Joanne Harding | Home Builders Federation | 29/12/22 09:40 | Only apply a higher standard in local policy if there is strong evidence to justify it. | Comments are noted, the evidence, including consultation representations, will be a key element of determining the policy approach. |
| BLPIO-430 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:01 | Yes | Noted |
| BLPIO-60 | Ms Libby Harris | Birmingham Friends of the Earth | 24/11/22 19:05 | To reduce water stress | Comments are noted. |
| BLPIO-134 | Mr David Carter | Tyler Parkes | 05/12/22 09:39 | New development should comply to Building Regulation Requirements. | Comments are noted. |
| BLPIO-306 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:46 | This is adequately covered by Building Regulations. | Comments are noted. |
| BLPIO-423 | | | 29/12/22 15:29 | Water usage should be limited to 110 l/p/d and developments that choose to go beyond this limit should be incentivised. | Comments are noted. |
| BLPIO-436 | Becky Clarke | BCC Lead Local Flood authority | 30/12/22 09:27 | Birmingham LLFA support proposals to introduce higher water efficiency standards, considering the rising population in Birmingham. | Support noted. |

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| <u>BLPIO-540</u> | Mr David Joseph | Bloor Homes | 05/01/23 10:52 | Building regulations are sufficient. There is no need for a local policy that would go beyond these standards. Any policy that does so would need to be justified with strong evidence in line with the PPG. | The comments are noted and will be considered further through the Local Plan Review up to Regulation 19 stage and considered alongside updated evidence. |
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Question 24 - Do you agree with introducing a policy to prevent overheating of new buildings?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| <u>BLPIO-112</u> | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:11 | Building regulations to focus on design for discharging heat in dwellings as well. | Comments are noted however the Local Plan cannot amend building regulations. |
| <u>BLPIO-321</u> | Paul Gilmour | Dale Farm | 14/12/22 15:51 | Yes but this requires a different approach to retrofitting insulation in some homes – external insulation & the visual impact it has must be allowed. Suggests that local energy generation is not required s the grid is decarbonising. | Comments are noted. Whilst the national target for net zero is 2050, Birmingham City Council has a target to be net zero carbon by 2030 or as soon thereafter as a just transition allows and the Local Plan must support the delivery of this. |
| <u>BLPIO-441</u> | Imogen Forster | St Joseph Homes Limited | 30/12/22 10:18 | Policy should align with the building regulation requirements. | Comments are noted. |
| <u>BLPIO-588</u> | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:52 | The plan should include the highest possible energy efficiency standards for keeping buildings warm. As buildings with better insulation for keeping warm will also help these buildings to stay cool. | Comments are noted. Any energy efficiency standards need to be viable and this will be tested through the viability assessment. |

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| BLPIO-60 | Ms Libby Harris | Birmingham Friends of the Earth | 24/11/22 19:05 | Induce more green infrastructure to provide shade and urban cooling and need to be aware of energy disadvantages of tall buildings such as energy loss and excess heat gain. | Comments are noted. The Local Plan seeks to enhance the City's green infrastructure network. The Local Plan will set policies for energy efficiency in all buildings. |
| BLPIO-170 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:14 | No views. | Noted |
| BLPIO-306 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:46 | It should be an intrinsic component of good design to ensure resilience to the effects of climate change. Not convinced that a specific policy is required. | Comments are noted. |
| BLPIO-475 | | Midlands Land Portfolio Ltd | 30/12/22 15:20 | Policy not required as it is covered by building regulations. | Comments are noted. |
| BLPIO-551 | Mr Antony Whitehead | Our Town | 05/01/23 16:10 | Policy should promote standards that can be consistently applied - both within the city and in the context of standards applied in other areas such as London. | Comments are noted and agreed, although need to be considered alongside viability issues in line with the latest Written Ministerial Statement. |
| BLPIO-9 | Mr Lewis Lucas | | 04/11/22 08:27 | Too expensive Should be decided nationally. | Comments are noted. |

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| BLPIO-48 | Mr Mike Mounfield | Colmore BID | 21/11/22 15:55 | Yes | Noted |
| BLPIO-68 | Mr Chris Brammeier | Warwickshire County Council Lead Local Flood Authority | 28/11/22 10:48 | Yes | Noted |
| BLPIO-149 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:51 | Yes | Noted |
| BLPIO-161 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:37 | Yes – and include planting trees around new buildings as a way to lower temperatures. | Comments are noted and support is welcomed. |
| BLPIO-269 | Unknown | Westside Business Improvement District | 13/12/22 15:52 | It should be an intrinsic component of good design to ensure resilience to the effects of climate change. Not convinced that a specific policy is required. | Comments are noted. |
| BLPIO-401 | Joanne Harding | Home Builders Federation | 29/12/22 09:40 | A balanced and flexible policy approach is required. | Comments are noted. |
| BLPIO-430 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:01 | Yes | Noted |

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| BLPIO-74 | Miss Natasha Styles | Planning Bureau | 29/11/22 10:16 | Yes, however in setting any policy that aims to prevent overheating also needs to balance daylight and sunlight. | Comments are noted. |
| BLPIO-436 | Becky Clarke | BCC Lead Local Flood authority | 30/12/22 09:27 | Birmingham LLFA would strongly support a policy that addressed this issue (through the incorporation of green/blue roofs or other SuDS features). | Support noted. |
| BLPIO-452 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:23 | Policy not required as it is covered by building regulations. | Comments are noted. |
| BLPIO-468 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:33 | Policy not required as it is covered by building regulations. | Comments are noted. |
| BLPIO-540 | Mr David Joseph | Bloor Homes | 05/01/23 10:52 | No particular preference but any policy should include flexibility for solar gain to be used for heating and illumination. | Comments noted. |

Question 25 - Should the Plan include a policy to ensure that rivers within the city provide multi-functional benefits in relation to flood risk, ecology biodiversity and support health and wellbeing?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
|---------------------------|--------------------|------------------------|-------------------|---|--|
| BLPIO-134 | Mr David Carter | Tyler Parkes | 05/12/22 09:39 | The city's green infrastructure network should be carefully managed and maintained balancing these objectives. | Comments are noted. |
| BLPIO-306 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:46 | It should be encouraged rather than being an essential part of a policy. | Comments are noted. |
| BLPIO-423 | | | 29/12/22 15:29 | <ol style="list-style-type: none"> 1. Create a buffer of at least 8m (encourage a 20m buffer) from river channels for multifunctional corridors, naturalise watercourse and reduce flood risk. 2. New builds set the direction as above in point 21 by establishing these corridors as a long-term strategy and re-assigning other land to create the corridor for people and wildlife. | Comments are noted and will be further considered through Green/Blur Infrastructure policy development through to publication stage of the BDP Review. |

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| BLPIO-21 | Mr Joshua James | Severn Trent Water | 09/11/22 12:20 | With the pressures of climate change, growth and urban creep, it is important that we find smarter solutions to issues such as flood risk. Providing multi-functional and multi-benefit solutions such as watercourse improvements is something that Severn Trent is in favour of. | Comments are noted. The Birmingham Local Plan will set out policy on managing flood risk and will undergo a Strategic Flood Risk Assessment. |
| BLPIO-369 | Rosamund Worrall Unknown | Historic England | 21/12/22 13:01 | Historic environment should also be included as a multi-functional benefit. | Comments are noted. Consider including the historic environment as a multi functional benefit of the city's rivers. |
| BLPIO-395 | Mr Richard Forbes | Canal and Rivers Trust (Planning Manager) | 28/12/22 12:50 | Include canals as part of the wider blue infrastructure when setting out policies. | Comments are noted. Canals will be included in any blue infrastructure policy. |
| BLPIO-588 | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:52 | We would definitely strongly support this. | Support is welcomed. |
| BLPIO-9 | Mr Lewis Lucas | | 04/11/22 08:27 | Primary purpose of rivers should be to provide leisure opportunities for residents. We need bars, restaurants and cafes fronting our rivers and canals. | Comments are noted however, the provision of leisure activities needs to be balanced with nature conservation. |

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| BLPIO-48 | Mr Mike Mounfield | Colmore BID | 21/11/22 15:55 | Yes | Noted |
| BLPIO-68 | Mr Chris Brammeier | Warwickshire County Council Lead Local Flood Authority | 28/11/22 10:48 | Policy should be strengthened to deculvert more watercourse and see water as an asset. Flood risk from sources other than the canal/river need to be better considered. | Comments are noted, the SFRA will consider flood risk from all sources and will inform the preparation of the Local Plan. |
| BLPIO-149 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:51 | Policy should ensure that targeted investment in the maintenance and enhancement of rivers in Birmingham maximises the benefits through the provision/improvement on biodiversity, climate change, and fair access to open space. | Comments are noted and support is welcomed. |
| BLPIO-161 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:37 | The River Rea disappears beyond Cannon Hill Park. It could become a feature in the city. | Comments are noted. The Rea Valley Urban Quarter SPD sets out a vision for the Rea Valley. |
| BLPIO-269 | Unknown | Westside Business Improvement District | 13/12/22 15:52 | It should be encouraged rather than being an essential part of a policy. | Comments are noted. |

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| BLPIO-401 | Joanne Harding | Home Builders Federation | 29/12/22 09:40 | A blue infrastructure policy may be appropriate. | Comments are noted, ensure that blue infrastructure is incorporated into the green infrastructure policy. |
| BLPIO-430 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:01 | Yes | Noted |
| BLPIO-436 | Becky Clarke | BCC Lead Local Flood authority | 30/12/22 09:27 | <ol style="list-style-type: none"> 1. A specific policy should be created to address the risks posed by retaining culverted and canalised watercourses which include asset failure, lack of inspections and maintenance issues, and the severing of connections between Birmingham's green spaces, and developments. 2. Create a buffer of at least 20m from river channels for active travel and green corridors for habitat creation/water absorption, to naturalise watercourse and reduce flood risk. 3. Policy is needed to object developments that proposes to build new structures on top of ordinary watercourses or within the byelaw easement. | Comments supported. Policy TP6 will be amended in consultation with the LLFA. |

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| | | | | <p>4. Policy should provide a presumption that de-culverting and naturalisation of watercourses must be undertaken unless proven to be technically unfeasible on flood risk management grounds, and with the agreement of the regulatory authority..</p> <p>5. Encourage positive orientation of developments along river corridors</p> | |
| BLPIO-468 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:33 | Policy should be flexible to allow for circumstances where the catchment-based approach cannot be applied. | Comments are noted. |
| BLPIO-540 | Mr David Joseph | Bloor Homes | 05/01/23 10:52 | No comment. | Noted |

Question 26 - Should the Plan include a policy to ensure a catchment-based approach to flood risk management from all sources and deliver climate resilience?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
|----------------------------------|-----------------------------|---|-------------------|--|---|
| <u>BLPIO-21</u> | Mr Joshua James | Severn Trent Water | 09/11/22 12:20 | In our upcoming Drainage and Wastewater Management Plan, we identify a need for better collaboration on multi-benefit solutions to flood risk management and a catchment-based approach would align well with this. | Comments are noted and support is welcomed. |
| <u>BLPIO-112</u> | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:11 | Yes | Noted |
| <u>BLPIO-395</u> | Mr Richard Forbes | Canal and Rivers Trust (Planning Manager) | 28/12/22 12:50 | SFRAs should consider risks from/to all sources, including canals, at the planning application stage. Provide developers with the opportunities to dispose of surface water drainage with drainage to surface water bodies like canals. | Comments are noted. The SFRA includes flood risk from canals. |
| <u>BLPIO-588</u> | Councillor Julien Pritchard | Green Party Group | 09/01/23 16:52 | Our suggested policy addition of dual roofs would also assist with | Comments are noted. |

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| | | | | this aim, as green/brown roofs also assist in absorbing surface water. | |
| BLPIO-9 | Mr Lewis Lucas | | 04/11/22 08:27 | Yes | Noted |
| BLPIO-48 | Mr Mike Mounfield | Colmore BID | 21/11/22 15:55 | Yes | Noted |
| BLPIO-68 | Mr Chris Brammeier | Warwickshire County Council Lead Local Flood Authority | 28/11/22 10:48 | Yes | Noted |
| BLPIO-149 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:51 | Yes, this is likely the only manner in which meaningful flood risk management can be achieved. | Comments are noted and support is welcomed. |
| BLPIO-161 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:37 | Yes – including considering the increasing risk of flooding caused by runoff on impermeable surfaces. | Comments are noted and support is welcomed. Nationally, there are now restrictions on impermeable surfaces. |
| BLPIO-430 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:01 | Yes | Noted |
| BLPIO-436 | Becky Clarke | BCC Lead Local Flood authority | 30/12/22 09:27 | 1. All flood risk management partners (Severn Trent Water, Highways, Canal and River Trust, Birmingham | 1. Agree. |

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| | | | | <p>LLFA) should be consulted on the Strategic Flood Risk Assessment.</p> <p>2. Removing 'unless it can be demonstrated that the cost of achieving this would make the proposed development unviable' in TP6</p> <p>3. Strengthening planning policy would see future improvements incorporate SuDS and green infrastructure at the earliest stage of project design and help to reduce flood risk in the city.</p> | <p>2. Policy TP6 will be amended in consultation with the LLFA.</p> <p>3. Comment noted.</p> |
| BLPIO-452 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:23 | Policy should be flexible to allow for circumstances where the catchment-based approach cannot be applied. | Comments are noted. |
| BLPIO-540 | Mr David Joseph | Bloor Homes | 05/01/23 10:52 | No comment | Noted |
| BLPIO-60 | Ms Libby Harris | Birmingham Friends of the Earth | 24/11/22 19:05 | Yes | Noted |

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| BLPIO-134 | Mr David Carter | Tyler Parkes | 05/12/22 09:39 | The city's green infrastructure network should be carefully managed and maintained. | Comments are noted. |
| BLPIO-170 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:14 | We are not qualified to say. | Noted |
| BLPIO-423 | | | 29/12/22 15:29 | <ul style="list-style-type: none"> • The individual river catchments in Birmingham should be assessed for flood reduction by SUDS on land away from the main rivers that can also deliver wider biodiversity and community value • WCS to consider catchment-based consideration of foul drainage due to joint pressure on sewage treatment works from neighbouring LAs. • Removal of weirs • Removal of culverts as part of development/ have them run under green space/playing fields. | Comments are noted, these issues will be considered in the development of the Local Plan. |

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| BLPIO-475 | | Midlands Land Portfolio Ltd | 30/12/22 15:20 | Policy should be flexible to allow for circumstances where the catchment-based approach cannot be applied. | Comments are noted. |
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Question 27 - How should the city's green infrastructure network be improved and expanded?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-10 | Mr Lewis Lucas | | 04/11/22 08:32 | More tall buildings and greenings along street and waterbodies. | Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being for local residents. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure. |
| BLPIO-49 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:04 | Partner with BIDs to facilitate green infrastructure works. | The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure and will work with a wide range of partners and stakeholders (including BIDs) to achieve this. Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's |

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| | | | | | environment and improves health and well-being for local residents. |
| BLPIO-69 | Mr Chris Brammeier | Warwickshire County Council Lead Local Flood Authority | 28/11/22 10:53 | Strengthening TP6. Increase urban greening and BNG with high-quality above ground SuDS. | The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure which will include SuDS. Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being for local residents. |
| BLPIO-150 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:58 | Adoption of a Local Nature Recovery Strategy, as required by the Environment Act | Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being for local residents. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure and link this to the use of Local Nature Recovery Strategies (LNRS), introduced by the government through the |

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| | | | | | Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. |
| BLPIO-414 | Calthorpe Estates | | 29/12/22 14:30 | <ul style="list-style-type: none"> • The Estate has the potential to open up access to green spaces • Support the vision to enhance access to the Botanical Gardens and to increasing visitor numbers. | <p>The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City’s green infrastructure.</p> <p>The new Local Plan will be seeking to take a more proactive approach to expanding the green infrastructure network including Birmingham's Urban Forest using the Local Nature Recovery Strategy and Urban Forest Master Plan to increase the number of trees and canopy cover.</p> |
| BLPIO-431 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:07 | Trees are important for climate change, not just to improve the street scene. | Trees are an important element of green infrastructure and policies are already in place for their protection but will also be tied in with Green Infrastructure policies which have a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city’s |

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| | | | | | environment and improves health and well-being for local residents. |
| BLPIO-124 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 21:15 | Birmingham Wheels Park should be included in the city's green infrastructure network. | The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure. Careful consideration will be made of potential areas where green infrastructure can be extended utilising areas of environmental value. |
| BLPIO-144 | Mr John Pearce | Bloor Homes | 05/12/22 10:11 | Promoting Bloor Home's proposal in Frankley. Suggest that recreational, green infrastructure and biodiversity objectives can also be achieved on this site whilst delivering a significant amount of new housing. | The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure. Individual sites and areas will be examined in more detail during the review of the Local plan. |
| BLPIO-188 | Gwyn James | Kier Highways | 05/12/22 16:22 | This section describes 'green' and 'blue' spaces yet omits any policy statement related to 'blue' spaces. | Blue spaces and infrastructure will be considered equally alongside green infrastructure when the policy framework is developed during the Preferred Options stage of the Local Plan. The new Local Plan will be seeking to take a more proactive approach to expanding the green and blue infrastructure network including Birmingham's Urban Forest using the Local |

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| | | | | | Nature Recovery Strategy and Urban Forest Master Plan to increase the number of trees and canopy cover. |
| BLPIO-453 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:31 | Support the tree canopy and habitats approach but these should not impact on the delivery of new homes. | Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being for local residents. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure. |
| BLPIO-469 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:37 | Support the tree canopy and habitats approach but these should not impact on the delivery of new homes. | Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being for local residents. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure. This will include the integration of green infrastructure as part of |

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| | | | | | overall place-making principles to create developments which meet people's needs in all respects including health and well-being. |
| BLPIO-541 | Mr David Joseph | Bloor Homes | 05/01/23 11:01 | No comment. | Noted |
| BLPIO-561 | IO Consultation Event - Perry Barr | | 06/01/23 17:05 | Need to open up the rivers more | This will be investigated as part of wider green infrastructure improvements which have a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. |
| BLPIO-578 | IO Consultation Event - Stirchley | | 09/01/23 12:26 | Centres like Stirchley need to be 'greened up' | Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being for local residents. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure. |

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| <p>BLPIO-26</p> | <p>Mr Joshua James</p> | <p>Severn Trent Water</p> | <p>09/11/22 12:33</p> | <p>Reintroduce green spaces in derelict and brownfield sites. Retrofit SuDS into built-up/urban areas.</p> | <p>Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being for local residents. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure.</p> |
| <p>BLPIO-113</p> | <p>Mr Matthew Vaughan</p> | <p>The Birmingham Civic Society</p> | <p>04/12/22 11:18</p> | <p>In principle support, improve and expand the GI network.</p> | <p>Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being for local residents. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure.</p> |
| <p>BLPIO-198</p> | <p>Ms Libby Harris</p> | <p>Birmingham Friends of the Earth</p> | <p>05/12/22 17:14</p> | <p>More details should be included in this part, including targets, plan for existing environments, inclusive</p> | <p>The new Local Plan will be seeking to take a more proactive approach to expanding the green infrastructure network including Birmingham's Urban Forest using the Local</p> |

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| | | | | policies, maintenance of GI and holistic GI measures. | Nature Recovery Strategy and Urban Forest Master Plan to increase the number of trees and canopy cover. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure in a comprehensive and holistic manner including any associate maintenance regimes. |
| BLPIO-249 | IO Consultation Event - Bham Lib | | 13/12/22 13:47 | More trees. | Trees are a key element of any green infrastructure protection and enhancement. Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being for local residents. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure. |
| BLPIO-396 | Mr Richard Forbes | Canal and Rivers Trust (Planning Manager) | 28/12/22 12:55 | <ul style="list-style-type: none"> Connect the open spaces with the help of the canal network and provide guidance for developers on | The new Local Plan will be seeking to take a more proactive approach to expanding the green infrastructure network including Birmingham's Urban Forest using the Local |

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| | | | | <p>how to improve and expand the GI network through mechanisms like planning process, corporate partnership, canal 10 and provision of recreational facilities.</p> <ul style="list-style-type: none"> • Maintenance of GI should be addressed in the policy as well • Keep the current policy requirements to protect and enhance existing infrastructure while expanding the GI network | <p>Nature Recovery Strategy and Urban Forest Master Plan to increase the number of trees and canopy cover. Policy DM4 of the Development Management in Birmingham DPD also seeks to protect trees for all developments and replace canopy cover for any loss of trees.</p> |
| BLPIO-135 | Mr David Carter | Tyler Parkes | 05/12/22 09:43 | Extend the green infrastructure network as part of development of an S.U.E. at Fox Hill. | The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure. Individual sites and areas will be examined in more detail during the review of the Local plan. |
| BLPIO-163 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:44 | By considering introducing a policy to protect all trees in the city, not just those in conservation areas. | The new Local Plan will be seeking to take a more proactive approach to expanding the green infrastructure network including Birmingham's Urban Forest using the Local Nature Recovery Strategy and Urban Forest Master Plan to increase the number of trees |

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| | | | | | and canopy cover. Policy DM4 of the Development Management in Birmingham DPD also seeks to to protect trees for all developments and replace canopy cover for any loss of trees. |
| BLPIO-171 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:21 | See Q 34 | Noted. |
| BLPIO-191 | IO Consultation Event - Sutton Cold | | 05/12/22 16:30 | Support urban greening, rooftop gardens and bars. | Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being for local residents. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure. |
| BLPIO-210 | IO Consultation Event - Northfield | | 08/12/22 09:38 | The city centre needs more green space | Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves |

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| | | | | | health and well-being for local residents. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure. |
| BLPIO-271 | Unknown | Westside Business Improvement District | 13/12/22 15:58 | Should require a proportion of green infrastructure to be provided on each site – subject to size and applies only to greenfield sites. | The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure. The new Local Plan will be seeking to take a more proactive approach to expanding the green infrastructure network including Birmingham's Urban Forest using the Local Nature Recovery Strategy and Urban Forest Master Plan to increase the number of trees and canopy cover. |
| BLPIO-307 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:50 | A proportion of green infrastructure should be provided on each site – subject to size and should only apply to greenfield sites. | Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity and green infrastructure. Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's |

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| | | | | | environment and improves health and well-being for local residents. |
| BLPIO-424 | Jane Field | Environment Agency | 29/12/22 15:35 | There should be a further emphasis on blue-green corridor, de-culverting and creating easements and open spaces for future flood alleviation schemes. | <p>The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure.</p> <p>The new Local Plan will be seeking to take a more proactive approach to expanding the green infrastructure network including Birmingham's Urban Forest using the Local Nature Recovery Strategy and Urban Forest Master Plan to increase the number of trees and canopy cover.</p> |
| BLPIO-440 | Becky Clarke | BCC Lead Local Flood authority | 30/12/22 10:09 | Seek to maximise opportunities within developments to expand the green river network. Off-site provision should not reduce the requirement for new developments to provide SuDS. | <p>Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being for local residents.</p> <p>The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure.</p> |

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| <p>BLPIO-476</p> | | <p>Midlands Land Portfolio Ltd</p> | <p>30/12/22 15:24</p> | <p>Support the tree canopy and habitats approach but these should not impact on the delivery of new homes.</p> | <p>Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city’s environment and improves health and well-being for local residents. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City’s green infrastructure. This will include the integration of green infrastructure as part of overall place-making principles to create developments which meet people's needs in all respects including health and well-being.</p> |
| <p>BLPIO-488</p> | | <p>MKF Investments</p> | <p>03/01/23 11:58</p> | <p>Specific areas should be designated as green infrastructure and open space rather than taking a broader approach.</p> | <p>Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city’s environment and improves health and well-being for local residents. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City’s green infrastructure.</p> |

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| | | | | | <p>The new Local Plan will be seeking to take a more proactive approach to expanding the green infrastructure network including Birmingham's Urban Forest using the Local Nature Recovery Strategy and Urban Forest Master Plan to increase the number of trees and canopy cover. Policy DM4 of the Development Management in Birmingham DPD also seeks to protect trees for all developments and replace canopy cover for any loss of trees.</p> |
| <p>BLPIO-500</p> | <p>Craig Rowbottom</p> | <p>Arup</p> | <p>03/01/23 14:55</p> | <ul style="list-style-type: none"> • Clarify on how developers should contribute to the mentioned strategies and test out new delivery models for strategies. • Implement the City of Nature plan, with infrastructure focusing on connectivity and linkage between sites. Different approach might be needed for city centre for such strategy. | <p>The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure.</p> <p>The new Local Plan will be seeking to take a more proactive approach to expanding the green infrastructure network including Birmingham's Urban Forest using the City of Nature plan and the Local Nature Recovery Strategy and Urban Forest Master Plan to increase the number of trees and canopy cover.</p> |

Question 28 - Should we explore a higher than 10% Biodiversity Net Gain for all major developments?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-10 | Mr Lewis Lucas | | 04/11/22 08:32 | Too expensive | <p>The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place.</p> <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |
| BLPIO-49 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:04 | But only for sites where biodiversity is negligible. | <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on</p> |

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| | | | | | viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-69 | Mr Chris Brammeier | Warwickshire County Council Lead Local Flood Authority | 28/11/22 10:53 | Yes | Noted |
| BLPIO-150 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:58 | Support. | <p>The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place.</p> <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |
| BLPIO-258 | | West Midlands Housing Association | 13/12/22 15:13 | increase of BNG requirement will need robust evidence that it is realistic. | The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development |

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| | | Planning Consortium (WMHAPC) | | | <p>site. This means that habitats for wildlife must be left in a measurably better state than before the development took place.</p> <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |
| BLPIO-327 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:15 | Support the proposal, the proposal should allow off-site provision, or provision through a credit system. | <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage including off-site provision. The Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |
| BLPIO-414 | Calthorpe Estates | | 29/12/22 14:30 | Combined impact on viability need to be considered for any additional requirements. | <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain</p> |

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| | | | | | percentage. The Council, through examining the evidence (particularly around viability as suggested), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-431 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:07 | Yes | Noted. |
| BLPIO-439 | Imogen Forster | St Joseph Homes Limited | 30/12/22 10:07 | 10% should be seen as a minimum but viability testing will be required to determine any other appropriate level. | Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-451 | Tarmac Trading Ltd | | 30/12/22 12:07 | Minimum requirement should not be higher than 10% to ensure viability, especially when many housing developments are on brownfield sites which has limited existing biodiversity. | The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place. Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing |

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| | | | | | biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-26 | Mr Joshua James | Severn Trent Water | 09/11/22 12:33 | Support achieving >10% BNG. | Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-198 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 17:14 | Support the proposal, with the gains being well-managed/monitored/invested. | Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. This will |

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| | | | | | include mechanisms as to how such gains will be managed, monitored and enforced. |
| BLPIO-322 | Paul Gilmour | Dale Farm | 14/12/22 15:55 | No – standard should be set by central government. | <p>The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place.</p> <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such, there is a case for seeking to achieve a higher net gain percentage. The Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage of the local plan.</p> |
| BLPIO-396 | Mr Richard Forbes | Canal and Rivers Trust (Planning Manager) | 28/12/22 12:55 | To require a >10% BNG, the policy should consider viability, and what location and scale of development such requirement applies. | <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and</p> |

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| | | | | | consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-589 | Councillor Julien Pritchard | Green Party Group | 09/01/23 17:04 | Support a 50% BNG requirement. | Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage. The Council, through examining the evidence (particularly on viability), will therefore consider higher rates of BNG and consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-135 | Mr David Carter | Tyler Parkes | 05/12/22 09:43 | Yes, in accordance with national legislation. | The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place. Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and |

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| | | | | | consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-163 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:44 | Support, given that all new green spaces will conform to standards such as 'no-mow May' for grass verges and other open space. | Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-242 | Mrs Michaela Moore | Hammerson - Bullring and Grand Central | 13/12/22 12:53 | Higher BNG requirement might conflict with higher densification target. A flexible approach for the application of BNG should be used to ensure viability. | The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place. Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and |

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| | | | | | consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-271 | Unknown | Westside Business Improvement District | 13/12/22 15:58 | Oppose the proposal. | Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-293 | | Henley Investment Management Ltd | 14/12/22 11:51 | Minimum target should be 10% and enable off-site provision or provision through a credit system. | <p>The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place.</p> <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and</p> |

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| | | | | | consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-307 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:50 | Oppose to the proposal. | <p>The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place.</p> <p>Birmingham, being highly urbanised with the majority of development occurring on brownfield sites with very limited existing biodiversity means there is a case for seeking to achieve a higher net gain percentage. The City Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |
| BLPIO-403 | Joanne Harding | Home Builders Federation | 29/12/22 09:49 | Do not support a policy that would go above the minimum 10% target. It should be for developers to decide whether this should be exceeded within their development schemes. | <p>The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place.</p> |

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| | | | | | Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-424 | Jane Field | Environment Agency | 29/12/22 15:35 | Support the proposal | Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-440 | Becky Clarke | BCC Lead Local Flood authority | 30/12/22 10:09 | Support. Should prioritise areas prone to surface water flooding. | The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place. |

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| | | | | | <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |
| <p>BLPIO-476</p> | | <p>Midlands Land Portfolio Ltd</p> | <p>30/12/22 15:24</p> | <p>10% gain should be followed. It should be up to developers to decide if they can go higher than this.</p> | <p>The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place.</p> <p>However, Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |

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| <p>BLPIO-488</p> | | <p>MKF Investments</p> | <p>03/01/23 11:58</p> | <p>Do not go above the 10% threshold. Some brownfield sites have high biodiversity and so a higher requirement would affect the viability of development when considered against other development costs for these sites.</p> | <p>The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place.</p> <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage. However it is recognised that issues such as viability of development is a factor and the Council, through examining the evidence (particularly on viability), will consider this carefully for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |
| <p>BLPIO-492</p> | | <p>University of Birmingham</p> | <p>03/01/23 13:40</p> | <p>Do not support a higher net gain target as national legislation has not yet been introduced and a higher target will affect development viability, particularly for greenfield sites.</p> | <p>The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place.</p> <p>Birmingham is highly urbanised, and the majority of development occurs on</p> |

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| | | | | | <p>brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |
| <p>BLPIO-500</p> | <p>Craig Rowbottom</p> | <p>Arup</p> | <p>03/01/23 14:55</p> | <p>Supported, but such increase is against housing option 4 and 6.</p> | <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |
| <p>BLPIO-532</p> | | <p>MEPC Limited</p> | <p>04/01/23 16:39</p> | <p>Support a higher requirement providing that it is viability tested.</p> | <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage. The Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |

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| <p>BLPIO-75</p> | <p>Miss Natasha Styles</p> | <p>Planning Bureau</p> | <p>29/11/22 10:18</p> | <p>Requiring 10% minimum goes against paragraph 57 of the NPPF and will reduce viability. Should let developers to decide whether or not to go >10% by projects.</p> | <p>The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place.</p> <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |
| <p>BLPIO-92</p> | <p>Mr Alex Jones</p> | <p>Gladman Retirement Living ltd</p> | <p>02/12/22 14:00</p> | <p>No objection for seeking BNG to meet 20%, but would be simpler to be in line with Environment Act (10%) and any developments that go beyond 10% will be considered as a material benefit in PA.</p> | <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |

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| <p>BLPIO-124</p> | <p>Mr David Carter</p> | <p>Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site</p> | <p>04/12/22 21:15</p> | <p>Birmingham Wheels Park has the capacity to provide some BNG.</p> | <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan as well as where it can be achieved.</p> |
| <p>BLPIO-144</p> | <p>Mr John Pearce</p> | <p>Bloor Homes</p> | <p>05/12/22 10:11</p> | <p>Agree to encourage BNG to go beyond 10% but should not be a policy requirement.</p> | <p>The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place.</p> <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |

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| BLPIO-312 | | Olympian | 14/12/22 15:32 | BNG requirement should remain at 10%, any further increments will pose negative effect on viability. | Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage. The Council, through examining the evidence (particularly around viability as highlighted), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. |
| BLPIO-453 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:31 | 10% gain should be followed. It should be up to developers to decide if they can go higher than this. | The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place. Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. |

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| <p>BLPIO-469</p> | <p>Mr James Chatterton</p> | <p>William Davis Ltd</p> | <p>30/12/22 14:37</p> | <p>10% gain should be followed. It should be up to developers to decide if they can go higher than this.</p> | <p>The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place.</p> <p>However, Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage and the Council, through examining the evidence (particularly on viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |
| <p>BLPIO-541</p> | <p>Mr David Joseph</p> | <p>Bloor Homes</p> | <p>05/01/23 11:01</p> | <p>Brownfield sites can often have high biodiversity. The national 10% threshold is fully tested and the most appropriate to apply.</p> | <p>Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage. The Council, through examining the evidence (particularly around viability), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan.</p> |

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| BLPIO-549 | Mark Sullivan | CPRE Warwickshire | 05/01/23 12:18 | Requires further consideration, in particular whether off-site gains might be detrimental to both the development site and the receptor site. | Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage including off-site gains where appropriate. The Council, through examining the evidence (particularly on viability as well as the impact of off-site provision), will consider this for inclusion and consultation as part of the Preferred Options stage to the local plan. |
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Question 29 - Should the new Local Plan seek to identify/allocate sites to provide off-site Biodiversity Net Gain?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-10 | Mr Lewis Lucas | | 04/11/22 08:32 | Yes | Noted |
| BLPIO-49 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:04 | But not where it allows developers to reduce gains on-site to save money. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-150 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:58 | Support, should be tied in Local Nature Recovery Network and together monitored by a live GIS-based solution. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such |

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| | | | | | cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-75 | Miss Natasha Styles | Planning Bureau | 29/11/22 10:18 | Support. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-124 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related | 04/12/22 21:15 | Birmingham Wheels Park have capacity to help with off-site provision. | Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions and where it could be applied. |

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| | | clubs, community groups, organisations and businesses formerly operating at the site | | | |
| BLPIO-453 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:31 | A comprehensive network of habitat banks is required to provide certainty for developers where off-site BNG is required. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-469 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:37 | A comprehensive network of habitat banks is required to provide certainty for developers where off-site BNG is required. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery |

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| | | | | | projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-541 | Mr David Joseph | Bloor Homes | 05/01/23 11:01 | Off-site allocations will allow a more coordinated rather than fragmented approach. These should be spread across different parts of the city. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-549 | Mark Sullivan | CPRE Warwickshire | 05/01/23 12:18 | See question 28 | See response to Q.28 |
| BLPIO-26 | Mr Joshua James | Severn Trent Water | 09/11/22 12:33 | Prioritise on-site BNG gain potentially through SuDS/blue-green infrastructure. Off-site BNG | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment |

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| | | | | <p>provision that provide other benefits like flood risk management is welcomed.</p> | <p>Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions.</p> |
| <p>BLPIO-198</p> | <p>Ms Libby Harris</p> | <p>Birmingham Friends of the Earth</p> | <p>05/12/22 17:14</p> | <p>This should be the last resort, but areas of grass and tarmac can be used for such purpose.</p> | <p>Off-site provision will be a last resort. However, the Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions.</p> |

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| BLPIO-322 | Paul Gilmour | Dale Farm | 14/12/22 15:55 | Difficult to identify/allocate the correct site, and might counter the aim of the underlying policy. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-589 | Councillor Julien Pritchard | Green Party Group | 09/01/23 17:04 | This should only be the last resort. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage |

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| | | | | | (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-163 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:44 | Support the proposal. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-171 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:21 | See Q 34 | Noted |
| BLPIO-271 | Unknown | Westside Business Improvement District | 13/12/22 15:58 | Support the proposal, should group together a few larger sites to create large areas of open space. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to |

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| | | | | | contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-307 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:50 | Support. Group up off-site provision to create large areas of open spaces for nature. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-403 | Joanne Harding | Home Builders Federation | 29/12/22 09:49 | Support the identification and allocation of sites for off-site Biodiversity Net Gain. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be |

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| | | | | | achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-424 | Jane Field | Environment Agency | 29/12/22 15:35 | Support item 6.6 to 6.11. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-440 | Becky Clarke | BCC Lead Local Flood authority | 30/12/22 10:09 | Support such approach if off-site provisions alike contribute to green | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment |

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| | | | | and blue corridors and retrofitting of SuDS in heavily urbanise areas. | Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation, flood plain restoration and retrofitting of SuDS. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |
| BLPIO-476 | | Midlands Land Portfolio Ltd | 30/12/22 15:24 | A comprehensive network of habitat banks is required to provide certainty for developers where off-site BNG is required. | The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions. |

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| <p>BLPIO-500</p> | <p>Craig Rowbottom</p> | <p>Arup</p> | <p>03/01/23 14:55</p> | <p>Support the proposal, but developers need to demonstrate that every effort is made to provide on-site BNG.</p> | <p>The Council will be able to use Local Nature Recovery Strategies (LNRS), introduced by the government through the Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers will have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale but this will need to be a last resort once all options of providing on-site BNG has been exhausted. These could include, for example, woodland creation and flood plain restoration. Further evidence is being sought prior to the Preferred Options stage (particularly on viability) to justify the position of off-site contributions.</p> |
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Question 30 - Should the Council introduce an Urban Greening Factor policy?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-10 | Mr Lewis Lucas | | 04/11/22 08:32 | Too expensive. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-49 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:04 | Can form the basis for baseline and targets. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments |

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| | | | | | which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-69 | Mr Chris Brammeier | Warwickshire County Council Lead Local Flood Authority | 28/11/22 10:53 | Yes | Noted |
| BLPIO-150 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:58 | Support. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-431 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:07 | Yes | Noted |

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| BLPIO-75 | Miss Natasha Styles | Planning Bureau | 29/11/22 10:18 | Exempt older people's housing schemes when considering minimum residential outdoor amenity open space size and focus on quality of space instead. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-188 | Gwyn James | Kier Highways | 05/12/22 16:22 | More investment for the maintenance of green infrastructure is needed as well. | The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening, (as part of the overall network of green infrastructure), required in new developments which has been done in places such as London. Viability evidence |

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| | | | | | will determine the feasibility and level of such a policy. |
| BLPIO-453 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:31 | Support the principle of such a policy but the detail of a target figure and scoring mechanism should be provided for comment at the draft plan stage. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-469 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:37 | Support the principle of such a policy but the detail of a target figure and scoring mechanism should be provided for comment at the draft plan stage. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as |

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| | | | | | London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-541 | Mr David Joseph | Bloor Homes | 05/01/23 11:01 | There should not be a blanket policy requirement. This needs to be considered on a site by site basis instead. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-26 | Mr Joshua James | Severn Trent Water | 09/11/22 12:33 | Support. | The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |

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| BLPIO-113 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:18 | Learn from good practice in London. | We will consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-198 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 17:14 | Support this proposal. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-322 | Paul Gilmour | Dale Farm | 14/12/22 15:55 | No a policy that allows a more local and site specific approach while still aiming for urban greening is more appropriate. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero |

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| | | | | | goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-589 | Councillor Julien Pritchard | Green Party Group | 09/01/23 17:04 | Support. Can be linked to multi-functional (green) roofs. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-135 | Mr David Carter | Tyler Parkes | 05/12/22 09:43 | Support, but require justification for it to be a policy. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero |

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| | | | | | goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-163 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:44 | Yes – but this should not just apply to major developments. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-171 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:21 | See Q 34 | Noted |
| BLPIO-271 | Unknown | Westside Business Improvement District | 13/12/22 15:58 | <ul style="list-style-type: none"> Support the proposal, can combine GI provision and BNG requirements. | The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban |

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| | | | | <ul style="list-style-type: none"> • Should focus on public realm around the city • Tackle the 'Persuasive "greening"' of plans. | greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-307 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:50 | Support the proposal, can explore ways to combine GI provision and BNG requirements. | The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-476 | | Midlands Land Portfolio Ltd | 30/12/22 15:24 | Support the principle of such a policy but the detail of a target figure and scoring mechanism should be provided for comment at the draft plan stage. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero |

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| | | | | | goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence will determine the feasibility and level of such a policy. |
| BLPIO-532 | | MEPC Limited | 04/01/23 16:39 | Support the principle of urban greening but this needs to be considered alongside other requirements and should be viability tested. | Urban greening is about making streets, buildings and other public spaces green. The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design which will be essential in helping to achieve net zero goals. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments which has been done in places such as London. Viability evidence, as suggested, will determine the feasibility and level of such a policy. |

Question 31 - Do you agree with the proposed new standards for open space?

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| BLPIO-92 | Mr Alex Jones | Gladman Retirement Living ltd | 02/12/22 14:00 | Support. But evidence is needed to support the change in requirements and demonstrate such provision is feasible. | The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments. and will be essential in providing sufficient open space for a growing population. |
| BLPIO-124 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 21:15 | Revision of policy should not lead to the loss of public or valued private open spaces. | The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future |

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| | | | | | <p>developments, essential in providing sufficient open space for a growing population.</p> <p>Individual examples will be examined in more detail at the Preferred options stage in accordance with the open space evidence currently being gathered and collated.</p> |
| BLPIO-453 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:31 | Overall standards not supported but some of the standards for specific types of open space appear to be appropriate. | <p>The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments. and will be essential in providing sufficient open space for a growing population.</p> |
| BLPIO-469 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:37 | Overall standards not supported but some of the standards for specific types of open space appear to be appropriate. | <p>The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and</p> |

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| | | | | | <p>accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments. and will be essential in providing sufficient open space for a growing population.</p> |
| <p>BLPIO-541</p> | <p>Mr David Joseph</p> | <p>Bloor Homes</p> | <p>05/01/23 11:01</p> | <p>No objection but the standard will be easier to achieve on larger sites at the edge of the city and in the Green Belt than on previously developed city centre sites.</p> | <p>The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments and will be essential in providing sufficient open space for a growing population. It is proposed that on-site provision will be required in most locations where possible, subject to viability assessments.</p> |
| <p>BLPIO-49</p> | <p>Mr Mike Mounfield</p> | <p>Colmore BID</p> | <p>21/11/22 16:04</p> | <p>Particularly the differentiation of types of open space.</p> | <p>The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space.</p> |

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| | | | | | This new standard will help to protect existing open space and provide a benchmark for new open space in future developments. and will be essential in providing sufficient open space for a growing population. |
| BLPIO-150 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:58 | Yes | Noted |
| BLPIO-327 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:15 | <p>Proposal for standards for open space and any other policy requirements should be included in local plan, as only policies in the plan are subject to examination in public.</p> <p>Policy requirement for public space type should be area specific.</p> | The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space and allows for public space types to be area specific. This new standard will also help to protect existing open space and provide a benchmark for new open space in future developments and will be essential in providing sufficient open space for a growing population. |
| BLPIO-414 | Calthorpe Estates | | 29/12/22 14:30 | Splitting the requirement up within the policy is unnecessary, a more flexible approach should be taken. | The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current |

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| | | | | | BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space to ensure an adequate supply of each across the City. This new standard will also help to protect existing open space and provide a benchmark for new open space in future developments and will be essential in providing sufficient open space for a growing population. |
| BLPIO-431 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:07 | Yes | Noted |
| BLPIO-439 | Imogen Forster | St Joseph Homes Limited | 30/12/22 10:07 | Support the proposed new standards. | The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments, essential in providing sufficient open space for a growing population. Any flexibility within a proposed policy on open space provision will be considered prior to the Preferred Options consultation. |

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| BLPIO-26 | Mr Joshua James | Severn Trent Water | 09/11/22 12:33 | Potentially create multifunctional green spaces for flood mitigation/protection. | This new standard will help to protect existing open space and provide a benchmark for new open space in future developments. and will be essential in providing sufficient open space for a growing population but also help to mitigate against flood protection. |
| BLPIO-42 | Mr Stuart Morgans | Sport England | 18/11/22 09:32 | A need based approach supported by evidence should be used for playing pitch strategy. Demand can be estimated using Sport England's Playing Pitch Calculator. | The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments. and will be essential in providing sufficient open space for a growing population. |
| BLPIO-113 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:18 | Distance from open space instead of density. | The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and |

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| | | | | | accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments. and will be essential in providing sufficient open space for a growing population. |
| BLPIO-198 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 17:14 | <ul style="list-style-type: none"> • Support the proposal. • Should recognise and protect food growing land use. • Walking, running, cycling and gardening are more common forms of exercise than team game • Improve safety of cycling route | The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space which will be able to ensure specific provision of, for example allotments for food growing, in areas where there is insufficient provision. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments and will be essential in providing sufficient open space for a growing population. |
| BLPIO-322 | Paul Gilmour | Dale Farm | 14/12/22 15:55 | Oppose to the proposed approach. It is best to be handled at the planning stage according to local needs. | The new open space standard is derived from the very latest evidence with an Open Space Assessment for the whole City being carried out in 2022. The new standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split |

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| | | | | | <p>into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments and will be essential in providing sufficient open space for a growing population.</p> |
| <p>BLPIO-589</p> | <p>Councillor Julien Pritchard</p> | <p>Green Party Group</p> | <p>09/01/23 17:04</p> | <p>Raised standard to >2.5 ha per 1000 persons.</p> | <p>The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. This is based on up-to-date evidence carried out in 2022 as part of an Open Space Assessment of the whole City in accordance with latest guidance and methods. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments and will be essential in providing sufficient open space for a growing population.</p> |

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| BLPIO-135 | Mr David Carter | Tyler Parkes | 05/12/22 09:43 | Land uses to be included in the new standard should obey the requirement for public open space to be useable and accessible to all. | The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments. and will be essential in providing sufficient open space for a growing population. |
| BLPIO-163 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:44 | Increase the difficulties to get permission to build on allotments, playing fields etc | The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments. and will be essential in providing sufficient open space for a growing population. |

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| BLPIO-171 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:21 | See Q 34 | Noted |
| BLPIO-210 | IO Consultation Event - Northfield | | 08/12/22 09:38 | Green space is important | Agree. |
| BLPIO-271 | Unknown | Westside Business Improvement District | 13/12/22 15:58 | Self sustainable green energy production as described above. | The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments and will be essential in providing sufficient open space for a growing population. |
| BLPIO-293 | | Henley Investment Management Ltd | 14/12/22 11:51 | Proposals for standards for open space and any other requirements for development should be included within the local plan, as only policies in the plan are subject | The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into |

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| | | | | to public examination. The standard should reflect the capacity of sites to provide open spaces. | separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments. and will be essential in providing sufficient open space for a growing population. |
| BLPIO-424 | Jane Field | Environment Agency | 29/12/22 15:35 | Support the proposal. | The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments and will be essential in providing sufficient open space for a growing population. |
| BLPIO-476 | | Midlands Land Portfolio Ltd | 30/12/22 15:24 | Overall standards not supported but some of the standards for | The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. |

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| | | | | <p>specific types of open space appear to be appropriate.</p> | <p>The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments. and will be essential in providing sufficient open space for a growing population.</p> |
| <p>BLPIO-532</p> | | <p>MEPC Limited</p> | <p>04/01/23 16:39</p> | <p>Support the new standard, but it should be considered on a site by site basis.</p> | <p>The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect existing open space and provide a benchmark for new open space in future developments and will be essential in providing sufficient open space for a growing population.</p> |

Question 32 - How can we ensure that residents have good access to quality open space?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-10 | Mr Lewis Lucas | | 04/11/22 08:32 | Regenerate the canals. All canals in Birmingham should be like Brindley Place, with bars, restaurants, cafes and open spaces. | Canals are just one element of the green infrastructure across the City. The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure. |
| BLPIO-49 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:04 | Include open space in the concept of the 15 minute neighbourhood. | <p>Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local Government; designed to enhance and secure the future of the UK's green spaces.</p> <p>The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham's substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will</p> |

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| | | | | | <p>aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham. This will include the 15 minute neighbourhood concept.</p> |
| <p>BLPIO-150</p> | <p>Mr Alexander Lane</p> | <p>Wildlife Trust for the Birmingham and Black Country</p> | <p>05/12/22 10:58</p> | <p>Increase the accessibility, biodiversity, and transport links of open space</p> | <p>Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local Government; designed to enhance and secure the future of the UK's green spaces.</p> <p>The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham's substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality</p> |

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| | | | | | and quantity of parks and open spaces in Birmingham. |
| BLPIO-414 | Calthorpe Estates | | 29/12/22 14:30 | Enable the provision of safe and attractive connections to open spaces in new development with s.106 and CIL. | Accessibility to open space is an important element of the Future Parks Accelerator (FPA) programme which goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham's substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham. |
| BLPIO-124 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses | 04/12/22 21:15 | The evidence base appears to <i>deliberately</i> exclude extensive areas in use as private open space. The Birmingham Wheels Park is ready to reopen at short notice, but would require planning permission to be demolished. | Individual examples will be examined in more detail at the Preferred options stage in accordance with the open space evidence currently being gathered and collated. |

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| | | formerly operating at the site | | | |
| BLPIO-453 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:31 | No comment. | Noted |
| BLPIO-469 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:37 | No comment. | Noted |
| BLPIO-541 | Mr David Joseph | Bloor Homes | 05/01/23 11:01 | No comment. | Noted |
| BLPIO-26 | Mr Joshua James | Severn Trent Water | 09/11/22 12:33 | Reintroduce green walking spaces on derelict and brownfield sites | The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the Future Parks Accelerator programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham. |
| BLPIO-113 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:18 | Health Impact Assessments. | Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the |

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| | | | | | <p>National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local Government; designed to enhance and secure the future of the UK's green spaces.</p> <p>The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham's substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved, including health benefits, as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham.</p> |
| BLPIO-198 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 17:14 | <ul style="list-style-type: none"> • Engage with local people by area to address their needs. • More specific details on implementation are needed • Object Housing option 6 of releasing the greenbelt | <p>Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local Government; designed to enhance and secure the future of the UK's green spaces.</p> |

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| | | | | | <p>The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham’s substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham.</p> |
| <p>BLPIO-322</p> | <p>Paul Gilmour</p> | <p>Dale Farm</p> | <p>14/12/22 15:55</p> | <p>Improve the bad ones not build on them.</p> | <p>Open Space policy will still be primarily to protect existing open space where feasible. This is coupled with the Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local Government; designed to enhance and secure the future of the UK’s green spaces.</p> <p>The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of</p> |

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| | | | | | <p>green spaces across all areas of the Council and ensure that Birmingham’s substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham.</p> |
| <p>BLPIO-396</p> | <p>Mr Richard Forbes</p> | <p>Canal and Rivers Trust (Planning Manager)</p> | <p>28/12/22 12:55</p> | <p>Access to Canals could be enhanced as well as wayfinding and signage to raise awareness of open spaces and links from canals</p> | <p>Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme.</p> <p>The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham’s substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham.</p> |

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| <p>BLPIO-562</p> | <p>IO Consultation Event - Perry Barr</p> | | <p>06/01/23 17:06</p> | <p>More investment, better management and more playground/parks in lower income areas.</p> | <p>Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local Government; designed to enhance and secure the future of the UK's green spaces.</p> <p>The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham's substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham.</p> |
| <p>BLPIO-135</p> | <p>Mr David Carter</p> | <p>Tyler Parkes</p> | <p>05/12/22 09:43</p> | <p>This is a very important to quality of life although in some parts of the city it can be difficult to achieve.</p> | <p>Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the National Trust, National Lottery Heritage fund, and the Ministry for Communities,</p> |

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| | | | | | Housing and Local Government; designed to enhance and secure the future of the UK's green spaces. |
| BLPIO-163 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:44 | Involving residents at an early stage of creating open spaces through gardening. | <p>Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme.</p> <p>The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham's substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham.</p> |
| BLPIO-171 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:21 | This is a crucial question across the whole city--see Q 34. | Noted |
| BLPIO-191 | IO Consultation Event - Sutton Cold | | 05/12/22 16:30 | More open spaces/square within urban area and more playgrounds. Parks need to be | Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the |

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| | | | | <p>better managed in terms of amenities and security.</p> | <p>National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local Government; designed to enhance and secure the future of the UK's green spaces.</p> <p>The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham's substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham.</p> |
| <p>BLPIO-210</p> | <p>IO Consultation Event - Northfield</p> | | <p>08/12/22 09:38</p> | <p>Northfield has good local parks and generally well kept</p> | <p>Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local Government; designed to enhance and secure the future of the UK's green spaces.</p> |

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| BLPIO-223 | Chris Lowe | Push Bikes | 12/12/22 18:32 | <p>Assess by cycle is limited by safety and infrastructure. Access barriers need to be removed for non-standard cycles, and ample cycle parking also needed in publicly visible locations with a high level of social safety.</p> | <p>Policies which promote and enhance cycling provision across the City will be included in the Birmingham Local Plan, building on existing strategies and policies in the BDP and the Birmingham Transport Plan. This will include developing cycle schemes and route improvements including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and access improvements. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycling security and parking.</p> |
| BLPIO-271 | Unknown | Westside Business Improvement District | 13/12/22 15:58 | <ul style="list-style-type: none"> • TP9 requirement to be distance-based. • Support the draft proposal to require different types of typologies for open space | <p>Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local Government; designed to enhance and secure the future of the UK's green spaces.</p> <p>The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham's substantial</p> |

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| | | | | | green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham. |
| BLPIO-307 | Mr Andrew Mitchell | Walmley Golf Club Ltd | 14/12/22 14:50 | TP9 requirements to be distance-based. Support the proposal to require different types of typologies for open space provision. | Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham. |
| BLPIO-476 | | Midlands Land Portfolio Ltd | 30/12/22 15:24 | No Comments | Noted |
| BLPIO-552 | Mr Antony Whitehead | Our Town | 05/01/23 16:18 | Support for community led initiatives to deliver green space/green infrastructure improvements. | Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme. The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham's |

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| | | | | | <p>substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham.</p> |
| <p>BLPIO-556</p> | <p>IO Consultation Event - Erdington</p> | | <p>06/01/23 16:47</p> | <p>Improve hygiene, maintenance and security of open spaces.</p> | <p>Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local Government; designed to enhance and secure the future of the UK's green spaces.</p> <p>The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham's substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an</p> |

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| | | | | | overall programme of improving the quality and quantity of parks and open spaces in Birmingham. |
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Question 33 - How can the Birmingham Local Plan achieve high quality design in all developments?

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| BLPIO-100 | <p>The Tyler Parkes Partnership Ltd</p> <p>Gail Collins</p> | <p>West Midlands Police</p> | <p>02/12/22 18:49</p> | <p>Include details on how to achieve good design that reduce opportunities for crime.</p> | <p>Good design makes places enjoyable, safe and sustainable and can improve quality of life. The Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan.</p> |
| BLPIO-312 | | <p>Olympian</p> | <p>14/12/22 15:32</p> | <p>Tall Buildings:</p> <ul style="list-style-type: none"> Encourage BCC to prepare a tall building policy that inform suitable (or unacceptable) locations for tall building developments, | <p>In the right locations tall buildings can make important contributions toward delivering new homes, economic growth and regeneration. Tall buildings will be particularly important to the delivery of a growth strategy which seeks to optimise the</p> |

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| | | | | <p>possibly with the aid of an SPD.</p> <ul style="list-style-type: none"> Suggest to include Broad Street as a suitable location. <p>Historic Environment:</p> <ul style="list-style-type: none"> Promoting 224 Broad Street | <p>use of land. At the same time, it is also important to ensure that new development respects the existing historic character of the city and key landmarks and views that help to make Birmingham distinctive.</p> |
| BLPIO-453 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:31 | Agree with proposed approach. | <p>Good design makes places enjoyable, safe and sustainable and can improve quality of life. The Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan.</p> |
| BLPIO-469 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:37 | Agree with proposed approach. | <p>The Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to</p> |

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| | | | | | <p>have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan.</p> |
| BLPIO-541 | Mr David Joseph | Bloor Homes | 05/01/23 11:01 | No comment. | Noted |
| BLPIO-26 | Mr Joshua James | Severn Trent Water | 09/11/22 12:33 | No specific comments | Noted |
| BLPIO-113 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:18 | Consult the Birmingham Civic Society Planning Committee in policy/scheme making. | The City Council will endeavour to improve its policies as to how and when Planning Services engage with the Birmingham Civic Society (BCS). In addition, the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters going forwards which has the full backing of the BCS. |

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| BLPIO-198 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 17:14 | <ul style="list-style-type: none"> • Support habitat link and resident health • Prioritise active travel movement • Respect local character and heritage assets in the city | <p>The Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards. The Design Guide recognises the issues highlighted including habitat links, active travel movement and local character and heritage.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan.</p> |
| BLPIO-249 | IO Consultation Event - Bham Lib | | 13/12/22 13:47 | Consider impacts of new developments to existing buildings/communities/businesses. | Noted and agreed. |
| BLPIO-322 | Paul Gilmour | Dale Farm | 14/12/22 15:55 | If the city require a design code, it should be breakdown to sub-ward level for diversity and individual characters of local centres and neighbourhoods. | Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area, or separate design codes for particular areas, will be considered and, if required, the Council intend to prepare a Design Code or Codes to sit alongside the Local Plan. The |

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| | | | | | <p>Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards.</p> |
| <p>BLPIO-370</p> | <p>Rosamund Worrall Unknown</p> | <p>Historic England</p> | <p>21/12/22 13:04</p> | <p>Require building for Healthy Life Assessments as part of local validation requirements.</p> | <p>Good design makes places enjoyable, safe and sustainable and can improve quality of life. The Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan.</p> |
| <p>BLPIO-396</p> | <p>Mr Richard Forbes</p> | <p>Canal and Rivers Trust (Planning Manager)</p> | <p>28/12/22 12:55</p> | <p>The future local design code should address waterside developments and should be consulted.</p> | <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the</p> |

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| | | | | | Council intend to prepare a Design Code to sit alongside the Local Plan. Design codes will be subject to consultation and engagement with relevant bodies including the Canals and Rivers Trust. |
| BLPIO-405 | Vita Group | Vita Group | 29/12/22 10:24 | Tall building policy in BLP should not be area specific. Guide for locations should be included in OFCP instead. | The Council are considering whether to introduce a tall buildings policy which will consider the most appropriate locations for them and ensure that they are well designed including greening of tall buildings. |
| BLPIO-10 | Mr Lewis Lucas | | 04/11/22 08:32 | Outsource planning to private company. | The planning system is highly regulated and decisions are made which fall within legal parameters set within national and local planning policies as well as the Planning Law framework set by Government. All decisions which fall outside of these parameters or our contrary to national or local planning policies are subject to scrutiny and all refusals for planning permission are eligible for appeal overseen by an independent planning inspector. |
| BLPIO-49 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:04 | Support. | Good design makes places enjoyable, safe and sustainable and can improve quality of life. The Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new |

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| | | | | | <p>Local Plan will need to ensure that the Council continue to have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan.</p> |
| BLPIO-150 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:58 | Adoption of more rigorous building standards, such as Building with Nature | <p>The Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan which would be able to consider, for example, more rigorous building standards.</p> |

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| BLPIO-414 | Calthorpe Estates | | 29/12/22 14:30 | <ul style="list-style-type: none"> • Unnecessary to have a locational policy for tall buildings. • Can refer to the Design Guide for detailed policy instead of including them in the BLP | <p>In the right locations tall buildings can make important contributions toward delivering new homes, economic growth and regeneration. Tall buildings will be particularly important to the delivery of a growth strategy which seeks to optimise the use of land. At the same time, it is also important to ensure that new development respects the existing historic character of the city and key landmarks and views that help to make Birmingham distinctive which means that a locational element to such a policy will need to be carefully considered.</p> |
| BLPIO-135 | Mr David Carter | Tyler Parkes | 05/12/22 09:43 | Policies set out should be equally applied to all sectors. | <p>The Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan</p> |

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| BLPIO-163 | Mrs Fiona Adams | The Moseley Society | 05/12/22 12:44 | A tall buildings policy should require models of all tall buildings to be tested in wind tunnels. | Comments are noted. The resilience of tall buildings to wind should be fully considered in their design and demonstrated to be feasible in the planning application. However, it would not be possible to test them all in wind tunnels due to the significant infrastructure requirements and impacts on the surrounding environment. |
| BLPIO-171 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:21 | Developers do not need to follow the yet to be adopted design guide. | The Council has produced the Birmingham Design Guide SPD which was actually adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards. Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan. |
| BLPIO-271 | Unknown | Westside Business Improvement District | 13/12/22 15:58 | By using design codes. | The Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters following on from Policy PG3 of the existing |

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| | | | | | <p>Birmingham Development Plan going forwards.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan.</p> |
| <u>BLPIO-307</u> | <p>Mr</p> <p>Andrew</p> <p>Mitchell</p> | Walmley Golf Club Ltd | 14/12/22 14:50 | By using design codes. | <p>The Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan.</p> |
| <u>BLPIO-440</u> | Becky Clarke | BCC Lead Local Flood authority | 30/12/22 10:09 | Support. Need to make guidance more accessible on the website. | The Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters |

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| | | | | | <p>following on from Policy PG3 of the existing Birmingham Development Plan going forwards.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan.</p> |
| BLPIO-476 | | Midlands Land Portfolio Ltd | 30/12/22 15:24 | Agree with proposed approach. | <p>The Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan.</p> |
| BLPIO-488 | | MKF Investments | 03/01/23 11:58 | No further policies required. | <p>The Council has produced the Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to</p> |

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| | | | | | <p>have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area will be considered and, if required, the Council intend to prepare a Design Code to sit alongside the Local Plan.</p> |
| BLPIO-532 | | MEPC Limited | 04/01/23 16:39 | Support more general guidance about the requirements for tall buildings which would be in line with the Design Guide SPD, but not anything more prescriptive such as locational based requirements. | In the right locations tall buildings can make important contributions toward delivering new homes, economic growth and regeneration. Tall buildings will be particularly important to the delivery of a growth strategy which seeks to optimise the use of land. At the same time, it is also important to ensure that new development respects the existing historic character of the city and key landmarks and views that help to make Birmingham distinctive and will therefore require some element of locational requirements. |
| BLPIO-552 | Mr Antony Whitehead | Our Town | 05/01/23 16:18 | Suggestions learnt from the Sutton Coldfield Masterplan include design competitions, local design panels, | Good design makes places enjoyable, safe and sustainable and can improve quality of life. The Council has produced the |

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| | | | | <p>design workshops, greater focus on Neighbourhood Plans and Community Development Trusts and site specific development plans.</p> | <p>Birmingham Design Guide SPD which was adopted in September 2022 and the new Local Plan will need to ensure that the Council continue to have a strong policy on design matters following on from Policy PG3 of the existing Birmingham Development Plan going forwards.</p> <p>Potential forthcoming requirements by the Government for all Local Authorities to produce a Design Code for their whole area, or for a particular area, will be considered and, if required, the Council intend to prepare such Design Codes to sit alongside the Local Plan. These will also need to be tied in with existing local evidence such as the work carried out as part of the Sutton Coldfield Masterplan to ensure that local character and circumstances are taken into consideration.</p> |
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Question 34 – Are there any specific issues that the Birmingham Local Plans need to address regarding the environment?

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| BLPIO-10 | Mr Lewis Lucas | | 04/11/22 | Tall buildings are essential as they allow more land to become available for green spaces. Adopt a tall building policy. | The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure. |
| BLPIO-191 | IO Consultation Event - Sutton Coldfield | | 05/11/22 | Preserving Birmingham's environment, character and culture in any further developments. More community facilities | The Local Plan will carry forward and update policies from the BDP to preserve Birmingham's environment, character and culture as well as facilitating the provision of community provision |
| BLPIO-26 | Mr Joshua James | Severn Trent Water | 09/11/22 | More holistic approach needed to balance between re/developments and protecting the natural environment. | It is important the Local Plan, once finalised, achieves the right balance in providing the growth that's required across the City as well as improving, protecting and enhancing the city's natural environment. |
| BLPIO-570 | IO Consultation Event - Ladywood | | 17/11/22 | More landmark/tall buildings needed. Less large block buildings and retain parks/open spaces in developments. | There are potential forthcoming national requirements for all Local Authorities to produce a Design Code for their whole area. Should this requirement be introduced, we intend to prepare a Design Code to sit alongside the Local Plan, as a |

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| | | | | | <p>separate document. Tall buildings will be addressed within the Design Code. Policy will seek to protect open spaces.</p> |
| <p>BLPIO-249</p> | <p>Consultation Event - Birmingham Library</p> | | <p>19/11/22</p> | <p>More amenities, hygiene and maintenance for green/open spaces.</p> | <p>Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local Government; designed to enhance and secure the future of the UK's green spaces.</p> <p>The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham's substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham.</p> |

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| <u>BLPIO-261</u> | Sulaymonova Dilafuz | | 19/11/22 | Appreciate natural area/buildings. Need more halal places. | The Local Plan will continue to have planning policies to protect and enhance the natural environment. The provision of more halal places is something which needs careful consideration alongside other food requirements given that Birmingham has a large, diverse and growing population which would want access to such places. |
| <u>BLPIO-263</u> | Saiman Miah | | 19/11/22 | More green spaces and parks, with better maintenance. Timetable developments to protect green spaces during construction. Support 15 minute neighbourhoods. | The Local Plan will continue to have planning policies to protect and enhance the natural environment. Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local Government; designed to enhance and secure the future of the UK's green spaces. |
| <u>BLPIO-266</u> | Miss Constantia Cooper-Jones | Resident Group | 19/11/22 | Clarify maintenance responsibilities and ownerships, and more regular schedule for green space maintenance. | Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local |

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| | | | | | Government; designed to enhance and secure the future of the UK's green spaces. |
| BLPIO-487 | Ross Franklin | Birmingham Airport Limited | 25/11/22 | <p>Consult Birmingham Airport for developments listed above within 13km of the airport, which include waste treatment, creation of waterbodies, ground reprofiling/landscaping work, mining and more.</p> <p>Birmingham Airport has recently developed its own tall buildings policy.</p> | Birmingham Airport is already a statutory consultee for the types of development listed. As part of the proposed Design Code for the City, tall buildings will be considered including the most appropriate locations for them, including Birmingham Airport's flight paths, and ensure that they are well designed including greening of tall buildings as well as consistent with Birmingham Airport's own Tall Buildings Policy. |
| BLPIO-69 | Mr Chris Brammeier | Warwickshire County Council Lead Local Flood Authority | 28/11/22 | Require buildings with flat roof to implement green/blue roofs to improve quality, amenity or biodiversity of surface water runoff. | The Plan will look to consider all issues which will help with flood mitigation and the impacts of Climate change as part of the Council's policy review for the new local plan. |
| BLPIO-431 | Jon Morris | Acocks Green Focus Group | 02/12/22 | Standard approach required for conservation areas. Embodied carbon needs to be considered in tall building developments. | Historic conservation will be an important element in built environment policies in the Local Plan. Embodied carbon will also be addressed through Climate Change and mitigation policies and will be considered as part of a tall buildings policy which will indicate the most appropriate locations for them and ensure that they are well |

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| | | | | | designed including greening of tall buildings. |
| <u>BLPIO-113</u> | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 | Tall buildings is an important planning issue | There are potential forthcoming national requirements for all Local Authorities to produce a Design Code for their whole area. Should this requirement be introduced, we intend to prepare a Design Code to sit alongside the Local Plan, as a separate document. Tall buildings will be addressed within the Design Code. |
| <u>BLPIO-440</u> | Becky Clarke | BCC Lead Local Flood authority | 05/12/22 | Ensure climate change/water/blue or green infrastructure management to be thoroughly integrated into the revise BDP. | Environmental protection and climate change mitigation will be key elements running through the new Local Plan for Birmingham. Further consultation will be undertaken throughout the development of the Local Plan including engagement with Birmingham Lead Local Flood Authority to ensure that supporting and evidence and policies cover these issues in the most comprehensive and appropriate way. |
| <u>BLPIO-150</u> | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 | Nature Recovery Network to include less conventional green corridors like rail corridors, road verges and the canal network for future improvements. | The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure and link this to the use of Local Nature Recovery Strategies (LNRS), introduced by the government through the |

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| | | | | | Environment Act 2021, to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. |
| BLPIO-293 | Mr Paul Rouse | Savills on behalf of Henley Investment Management Ltd | 05/12/22 | Avoid policy that require tall building applications to be full applications, as tall buildings in a single site tend to adopt phase delivery, their layout on site might be changed during the life of a PA. | The Council are considering whether to introduce a tall buildings policy which will indicate the most appropriate locations for them and ensure that they are well designed including greening of tall buildings. |
| BLPIO-163 | Mrs Fiona Adams | The Moseley Society | 05/12/22 | Focus on existing environment as well rather than just new developments. | The Local Plan has an obligation to meet all built development needs for the citizens and businesses but needs to be balanced with natural and environmental needs for diversity benefits as well as health and well-being benefits. |
| BLPIO-396 | Mr Richard Forbes (Planning Manager) | Canal and Rivers Trust | 05/12/22 | <p>Biodiversity spaces should be multi-functional</p> <p>Address the importance and benefits of Birmingham's canal network</p> <p>Tall building developments design to activate and engage with the waterway</p> <p>recognise the canal's contribution to historic heritage in the plan.</p> | The importance that the canal network and its role in the historic character and future development makes in Birmingham will be recognised within the Local Plan as well as its biodiversity value and focus for tourism. |

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| <p>BLPIO-370</p> | <p>Rosamund Worrall</p> | <p>Historic England</p> | <p>05/12/22</p> | <p>Rename the chapter as 'Natural, built and historic environment'.</p> <p>Consider the synergy between heritage and other draft plan elements.</p> <p>Tall building in some places will affect the specialness of historic environment.</p> <p>Identify potential areas for taller buildings/area to be excluded, through evidence base work.</p> | <p>The Issues and Options document was a consultation document that highlights the policy issues which need addressing and does not necessarily cover all of the issues which will appear in the final version of the Local Plan. Historic environment matters will therefore be given due consideration, weight and detail in the adopted local plan which will develop over the forthcoming consultation stages.</p> |
| <p>BLPIO-461</p> | <p>Emily Barker</p> | <p>Worcestershire County Council</p> | <p>05/12/22</p> | <p>On top of new developments, weight should be given to the assessment of existing character, contribution, and opportunity for green infrastructure.</p> | <p>The new Local Plan will be seeking to take a more proactive approach to expanding the green infrastructure network including Birmingham's Urban Forest using the Local Nature Recovery Strategy and Urban Forest Master Plan to increase the number of trees and canopy cover.</p> <p>Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being for local residents.</p> |

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| <p>BLPIO-171</p> | <p>Professor Jean Gilkison</p> | <p>Moseley Regeneration Group</p> | <p>05/12/22</p> | <p>More innovative ideas needed to introduce green spaces in the existing urban environment.</p> | <p>Birmingham is one of eight urban areas to promote a Future Parks Accelerator (FPA) programme which is part of a unique multi-million-pound initiative formed jointly by the National Trust, National Lottery Heritage fund, and the Ministry for Communities, Housing and Local Government; designed to enhance and secure the future of the UK's green spaces.</p> <p>The goal of the FPA programme goes beyond simply funding and maintaining parks. The programme seeks to embed the value of green spaces across all areas of the Council and ensure that Birmingham's substantial green infrastructure is well utilised, sustainable, and valued in the face of austerity. The Birmingham Local Plan will aim to provide policy support to ensure that the aims and objectives of the FPA programme are achieved as part of an overall programme of improving the quality and quantity of parks and open spaces in Birmingham.</p> |
| <p>BLPIO-500</p> | <p>Craig Rowbottom</p> | <p>Arup</p> | <p>05/12/22</p> | <p>Clarify on how the protected green belt can be incorporated as part of the GI network.</p> <p>Higher requirement for inner city developments to enhance GI,</p> | <p>Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. The new Local Plan will be seeking to take a more proactive approach to</p> |

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| | | | | without affecting the existing greenbelt. | expanding the green infrastructure network including Birmingham's Urban Forest using the Local Nature Recovery Strategy and Urban Forest Master Plan to increase the number of trees and canopy cover. |
| BLPIO-424 | Jane Field | Environment Agency | 05/12/22 | <p>Improvement for river and associated land, water quality, access to River Rea channel should be addressed.</p> <p>Victorian engineered channel should be removed to provide a softer bank gradient.</p> <p>Site specific structural assessment of the channel for developments within 8m on top of the bank of River Rea.</p> <p>Consider fluvial and surface water flood risk in SFRA</p> | These specific issues will be given consideration, and if deemed necessary, will be included as part of the strategic policy framework within the Plan. |
| BLPIO-388 | Carl Mellor | Dudley Metropolitan Borough Council | 05/12/22 | <p>Support protection of cross boundary natural and built environment.</p> <p>Welcome increased green linkages</p> <p>Can explore opportunities to create links for wildlife to travel between Birmingham and Dudley.</p> | The new Local Plan will be seeking to take a more proactive approach to expanding the green infrastructure network including cross-boundary links, Birmingham's Urban Forest using the Local Nature Recovery Strategy and the Urban Forest Master Plan to increase the number of trees and canopy cover |

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| <p>BLPIO-188</p> | <p>Gwyn James</p> | <p>Kier Highways</p> | <p>05/12/22</p> | <p>Clarify commitment and long-term management of heritage and infrastructure in highway environment.</p> <p>Address 'sky scape' or 'sky-line' of tall buildings development in the plan.</p> | <p>The long-term management of heritage materials and infrastructure that are significant to the historical importance of conservation areas and listed buildings is something which will be fully considered and part of the policy framework for the final stages of the Birmingham Local Plan. More detail will appear in the Preferred Options consultation.</p> <p>In the right locations tall buildings can make important contributions toward delivering new homes, economic growth and regeneration. Tall buildings will be particularly important to the delivery of a growth strategy which seeks to optimise the use of land. At the same time, it is also important to ensure that new development respects the existing historic character of the city and key landmarks and views that help to make Birmingham distinctive.</p> |
| <p>BLPIO-532</p> | <p>Rosie Cotterill</p> | <p>Turley on behalf of MEPC Limited</p> | <p>05/12/22</p> | <p>Support the new standard, but it should be considered on a site-by-site basis.</p> | <p>The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This new standard will help to protect</p> |

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| | | | | | existing open space and provide a benchmark for new open space in future developments and will be essential in providing sufficient open space for a growing population. |
| <u>BLPIO-198</u> | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 | Existing urban greening is as important as those in new developments. | <p>The Council will ensure that the Local Plan includes the protection and enhancement, where possible, of the City's green infrastructure which includes the existing urban green sites as part of the overall network.</p> <p>The new Local Plan will be seeking to take a more proactive approach to expanding the green infrastructure network including the existing green network and Birmingham's Urban Forest using the Local Nature Recovery Strategy and Urban Forest Master Plan to increase the number of trees and canopy cover as one element.</p> |

Question 35 - Do you agree with the proposed removal of the Regional Investment Sites designation?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| <u>BLPIO-50</u> | Mr Mike Mounfield | Colmore BID | 21/11/22 16:19 | Agree with removal of the RIS designation. | Support for removal of the RIS designation is noted. |
| <u>BLPIO-115</u> | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:30 | Yes, but restrict developments at Aston and Longbridge to B2 only. | Preference for Aston and Longbridge to remain restricted to B2 uses is noted. This could be prescribed within appropriately worded planning policies for the new Core Employment/Industrial Areas. |
| <u>BLPIO-175</u> | Miss Helen Davies | Transport for West Midlands | 05/12/22 14:39 | Support the removal of the RIS designation. | Support for the removal of the RIS designation is noted. |
| <u>BLPIO-415</u> | Calthorpe Estates | | 29/12/22 14:35 | Agree with the removal of the RIS designation. | Support for the removal of the RIS designation is noted. |
| <u>BLPIO-136</u> | Mr David Carter | Tyler Parkes | 05/12/22 09:49 | No, there is a continued need for strategic sites such as these. | It is recognised that there is a continuing need for larger strategic employment sites, but the HEDNA and HELAA have identified that there is sufficient land supply to meet the need for these larger sites over the next plan period. There is therefore no identifiable need to release further strategic |

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| | | | | | <p>employment land at Fox Hill or elsewhere in the city.</p> <p>The removal of the Regional Investment Sites designation would not detract from the strategic role of the Aston and Longbridge sites, instead there is an opportunity in the new Local Plan to change the designation of these areas to reflect modern economic needs.</p> |
| BLPIO-172 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:33 | No opinion. | Noted. |
| BLPIO-449 | Tarmac Trading Ltd | | 30/12/22 12:02 | Agree with the removal of the RIS designation. | Support for the removal of the RIS designation is noted. |
| BLPIO-101 | The Tyler Parkes Partnership Ltd Gail Collins | West Midlands Police | 02/12/22 18:53 | Support the removal of the RIS designation but need to ensure flexibility in future policy for Aston Police Station. | The presence of Aston Police Station and other existing non-B class uses within the Regional Investment Sites and Core Employment Areas will need to be considered in determining the future approach within these designated areas. |
| BLPIO-165 | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:02 | No opinion | Noted. |

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| BLPIO-358 | Mike Dunphy | Bromsgrove District Council | 21/12/22 11:38 | No objection, but want to see continued focus on high-quality advanced manufacturing at Longbridge and carrying forward the development objectives of the Longbridge AAP. | Whilst the Longbridge AAP is proposed to be superseded by the new Birmingham Local Plan, we can explore the potential to carry forward its objectives for the development of high-quality advanced manufacturing. This could be for example by specifying the range of uses that will be permitted in remaining Core Employment/Industrial Areas once the Regional Investment Site designation has been removed. |
| BLPIO-542 | Mr David Joseph | Bloor Homes | 05/01/23 11:13 | No comment. | Noted. |
| BLPIO-27 | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No comment | No comment noted. |
| BLPIO-178 | Mr Matthew Williams | Volume Property | 05/12/22 15:02 | Disagrees with the removal of the RIS designation. | Disagreement is noted, although it would be useful to understand the reasons for your answer. |
| BLPIO-323 | Paul Gilmour | Dale Farm | 14/12/22 15:57 | Agree with the removal of the RIS designation. | Support for removal of the RIS designation is noted. |
| BLPIO-363 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:20 | Support the removal of the RIS designation. | Support noted. |

Question 36 - Do you agree that the Core Employment Areas should be refocused on B2 and B8 uses only, including renaming them as Core Industrial Areas?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| <u>BLPIO-27</u> | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No comment | No comment noted. |
| <u>BLPIO-43</u> | Mr Stuart Morgans | Sport England | 18/11/22 09:59 | No view. Support more criteria for what constitutes an exception to the policy, including greater flexibility for sport and leisure developments. | We will consider the potential to include a wider range of uses to be permitted within the Core Employment/Industrial Areas, based on job creation. However we will need to balance this with the need to concentrate industrial uses in suitable locations across the city which reduce conflicts with adjoining uses and will also allow clustering and networking of industries (as required by the NPPF). Introducing too many other types of use in to such areas has potential to dilute this clustering of industry and therefore undermine the purposes of the designation. |
| <u>BLPIO-50</u> | Mr Mike Mounfield | Colmore BID | 21/11/22 16:19 | Agree with the proposed approach for Core Employment Areas. | Support for refocusing and renaming the Core Employment Areas is noted. |

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| BLPIO-115 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:30 | Yes, agree. | Support for refocusing and renaming the Core Employment Areas is noted. |
| BLPIO-126 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 21:21 | Core Employment Areas should include other uses that can't be accommodated elsewhere, such as health or leisure based activities. | It is recognised that there are already non-B class uses within the Core Employment Areas and these will need to be considered further as part of the review of this designation. However encouraging the further development of these has the potential to dilute and weaken the future employment land supply, which will have a knock-on effect in addressing the city's employment land shortfall. In addition, the Wheels Core Employment Area is also designated within the Bordesley Park Area Action Plan, which is not proposed to be replaced by the new Birmingham Local Plan. |
| BLPIO-136 | Mr David Carter | Tyler Parkes | 05/12/22 09:49 | Disagree with the proposed approach for Core Employment Areas. | Disagreement with the proposed approach is noted. |
| BLPIO-165 | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:02 | Need to increase focus on retrofitting existing properties. Products should be sourced locally. Also need to encourage zero carbon industries and training. | A policy on retrofitting of existing properties can be considered further, although to be effective and maximise its impact it would be more appropriate to apply this to all areas of the city and not just the Core Employment Areas. This could be delivered |

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| | | | | | <p>through an updated version of BDP policy TP3, which could also include increased emphasis on ensuring that building materials are sourced locally.</p> <p>It would not be possible for planning policies to require companies operating within Core Employment Areas to source their own products locally, but we may be able to specify the types of industry that would be appropriate in each area so that zero carbon industries and training can be encouraged. This could be applied in a similar way to the current BDP policies which focus waste management developments at Tyseley Environmental Enterprise Area and advanced manufacturing at Aston and Longbridge.</p> |
| BLPIO-172 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:33 | No views. | Noted. |
| BLPIO-186 | Zaza Cooper | Mondelez International | 05/12/22 16:07 | Support the proposed policy approach and the continued designation of the Cadbury factory as a Core Employment Area. The new policy should allow a wider range of ancillary uses where they support a wider B2 or B8 use. | Support for the proposed policy approach, with some allowance for non-B class ancillary uses is noted. |

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| BLPIO-178 | Mr Matthew Williams | Volume Property | 05/12/22 15:02 | The current Core Employment Areas within the ring road should not be protected as such in the future and should instead become more mixed use areas, including residential. This particularly applies to the Gun Quarter and Summer Lane areas. | The suggested removal of the Core Employment Areas within the ring road is noted. We will consider all relevant evidence, including that already provided by the HEDNA as well as the evidence that you have provided, to determine the most appropriate future direction for these areas. |
| BLPIO-175 | Miss Helen Davies | Transport for West Midlands | 05/12/22 14:39 | Size and quality need to be considered in the designation of the Core Employment Areas going forward. Consider the WMCA's Plan for Growth when identifying the policy approach for specific clusters in these areas. | The quality and size of employment land is considered in the recommended new portfolio set out in section 7 of the Issues and Options consultation document. Whilst Core Employment Areas could also be categorised in a similar way, it would be simpler and clearer if these areas were to be focused on supporting the growth of any industries that choose to locate there. The WMCA's Plan for Growth will be a key document in informing the proposed policy approach for these areas. |
| BLPIO-323 | Paul Gilmour | Dale Farm | 14/12/22 15:57 | Agree with the proposed policy approach for Core Employment Areas. | Support for the proposed approach for the Core Employment Areas is noted. |
| BLPIO-363 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:20 | Agree with the proposed new approach for Core Employment Areas. | Support for the proposed policy approach is noted. |

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| BLPIO-542 | Mr David Joseph | Bloor Homes | 05/01/23 11:13 | No comment. | Noted. |
| BLPIO-449 | Tarmac Trading Ltd | | 30/12/22 12:02 | Support the proposed approach for the Core Employment Areas. Sui Generis uses of an industrial nature should continue to be allowed in these areas. | Support for the proposed policy approach is noted. |

Question 37 - How do you think the shortfall in the supply of employment land should be addressed?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-136 | Mr David Carter | Tyler Parkes | 05/12/22 09:49 | Contradictory message that there is a shortfall of employment land but also a suggestion that some employment land could be lost to housing development. | A significant purpose of the Issues and Options consultation document is to set out the different ways that the identified housing and employment development needs can be accommodated. Some of these options include making choices about what different types of land use should be prioritised. Given the very high housing unmet housing needs it is appropriate to consider whether or not there is potential to accommodate some housing development on under utilised or poor quality employment land. The need to protect employment land from housing development or other types of development will be informed by evidence and this will inform the preferred approach for employment land provision in the new plan, alongside the Issues and Options consultation comments received. |
| BLPIO-172 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:33 | No views. | Noted. |

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| <p>BLPIO-382</p> | <p>Ian Culley</p> | <p>Wolverhampton City Council</p> | <p>21/12/22 14:43</p> | <p>Recognise the identified shortfall and support the approach to identify further sources of employment land supply within Birmingham, as well as the utilisation of 53 hectares at the West Midlands Interchange.</p> | <p>Supporting comments noted. Further opportunities to deliver employment development land within Birmingham will be explored further at the preferred options stage.</p> |
| <p>BLPIO-525</p> | | <p>IM Properties</p> | <p>04/01/23 12:05</p> | <p>The methodology for calculating employment land needs does not recognise the need for strategic sites, and that there is a shortfall of land to meet these needs. Additional strategic employment sites will need to be allocated in the new plan. This is evidenced by the high number of enquiries received from potential occupiers at Peddimore.</p> <p>The plot ratios applied within the HEDNA are not appropriate - 40% is more widely accepted than 50%, but they could even be as low as 35%.</p> <p>The shortfall of employment land should be accommodated across the FEMA, with close working required with other local</p> | <p>The West Midlands Plan for Growth and the West Midlands Strategic Employment Sites Study set the context for wider aspirational economic development across the region. We will continue to contribute towards the delivery of these wider aspirations where they are relevant to Birmingham. This includes contributing to the Stage 3 version of the WMSESS. As noted in your comments, the level of shortfall across the region has not been quantified.</p> <p>The HEDNA provides the local evidence to inform the employment land needs set out in the Issues & Options document, and this has been informed by engagement with the West Midlands Combined Authority and the West Midlands Growth Company (paragraph 13.41 and chapter 14 of the HEDNA). The HEDNA identifies that whilst there is a need for industrial sites of all sizes over the plan period, the need is more acute for small to medium sized sites. This is reflected in the</p> |

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| | | | | <p>authorities to agree where it should be distributed.</p> | <p>recommended new portfolio of employment land set out under paragraph 17.53 of the HEDNA which recommends that 33% of the future land portfolio should be for larger sites, which contrasts with 62% of the current portfolio set out under policy TP17 of the BDP (60 hectares out of a total 96 hectare reservoir). The HELAA 2022 identifies that the supply of larger sites over 10 hectares is already 20 hectares greater than the requirements of policy TP17, so there is no need to identify further large strategic sites to meet the lower requirements in the recommended new portfolio.</p> <p>In regard to the 50% plot ratio, this is considered appropriate for a heavily built up area such as Birmingham and has been set to achieve a more efficient use of land within the new plan. The examples provided in the submission are generally for locations with smaller settlements or containing rural areas where higher densities would not be appropriate.</p> <p>We will prepare statements of common ground with other authorities where it is clear that we cannot meet our full development needs within our own boundaries and other authorities have</p> |
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| | | | | | agreed to accommodate some of those unmet needs. |
| BLPIO-115 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:30 | Redevelop existing Core Employment Areas. | The suggested approach of the redevelopment, recycling and upgrading of Core Employment Areas is noted and will be considered further in the development of a new policy and designation for these areas. |
| BLPIO-175 | Miss Helen Davies | Transport for West Midlands | 05/12/22 14:39 | Important to liaise with other authorities in the HMA in the delivery of further employment land. TfWM also offer support, in particular in their role in attracting investors and enabling residents to access employment opportunities. | We will continue to work with TfWM and other authorities in the FEMA to ensure that sufficient land is provided to meet the identified economic development needs over the plan period. |
| BLPIO-516 | | Midland Land Ltd | 04/01/23 10:46 | delivering housing development on existing employment land is likely to compound the employment land shortfall. | This option was included because there is a far bigger shortfall of housing land than the shortfall of employment land, and so utilising some poor quality and underutilised employment land might allow a balanced pattern of development. |
| BLPIO-27 | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No comment | No comment noted. |

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| <p>BLPIO-126</p> | <p>Mr David Carter</p> | <p>Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site</p> | <p>04/12/22 21:21</p> | <p>Contradictory message of a shortfall of employment land but also suggesting that Core Employment Areas and sport/recreation facilities could be developed for housing.</p> | <p>A significant purpose of the Issues and Options consultation document is to set out the different ways that the identified housing and employment development needs can be accommodated. Some of these options include making choices about what different types of land use should be prioritised. Given the very high housing unmet housing needs it is appropriate to consider whether or not there is potential to accommodate some housing development on under utilised or poor quality employment land or open spaces. The need to protect such land uses from housing development or other uses will be informed by other evidence on the needs for these non-housing land uses. The preferred approach for employment land will be informed by such evidence, alongside the Issues and Options consultation comments received to determine the most appropriate approach to take forward at the Preferred Options stage.</p> |
| <p>BLPIO-178</p> | <p>Mr Matthew Williams</p> | <p>Volume Property</p> | <p>05/12/22 15:02</p> | <p>Small light industrial/warehousing and residential uses mixed together are suggested, but larger heavy industry and warehousing should be provided in Core Employment Areas away from the City Centre.</p> | <p>The suggestions of increased mixture of compatible small scale employment and residential uses, but the continued separating out of large scale and heavy industrial uses to the Core Employment Areas are noted.</p> |

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| BLPIO-282 | Mr Peter King | CPRE West Midlands | 13/12/22 21:27 | There is enough land within Birmingham to meet the identified needs. This includes land released for development following the construction of HS2. There is no need to utilise land at the West Midlands Rail Freight Interchange. | <p>The evidence in the HEDNA and the HELAA, as articulated in the Issues & Options consultation document, demonstrates that there is not enough land supply in the city to accommodate the identified employment land needs. This includes land at Washwood Heath that will be released for development following the construction of HS2.</p> <p>Evidence prepared by Stantec (West Midlands Strategic Rail Freight Interchange, Employment Issues Response Paper - Whose need will the SFRI serve?), as referenced within the Issues and Options consultation document, demonstrates that that the West Midlands Interchange site can accommodate 53 hectares of Birmingham's employment land needs as well as (not instead of) 72 hectares of the Black Country's and South Staffordshire's needs.</p> |
| BLPIO-323 | Paul Gilmour | Dale Farm | 14/12/22 15:57 | Develop on brownfield sites and also in authority areas outside the city, working in partnership with GBSLEP. | The emphasis on using brownfield land within the city and directing some development to other authority areas is noted. |
| BLPIO-363 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:20 | All opportunities to meet the shortfall within Birmingham should be explored before approaching other local authorities in the FEMA. | The City Council will continue to identify any opportunities that may exist within the city to accommodate the shortfall. The employment land shortfall is on a much lesser scale than the housing shortfall, so it |

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| | | | | Walsall has limited capacity to meet Birmingham's unmet needs. | is anticipated that if there is any unmet need remaining at the Preferred Options stage then it will be minimal. |
| BLPIO-389 | Carl Mellor | Dudley Metropolitan Borough Council | 21/12/22 16:14 | Support the identification of 53 hectares at the West Midlands Strategic Rail Freight Interchange. Also suggest that South Staffordshire is included in the FEMA. Opportunities to accommodate the employment land shortfall within the city should be maximised, particularly where sites are identified as suitable but not available. | The City Council will continue to identify opportunities to accommodate the employment land shortfall within Birmingham and will continue to work positively with adjoining authorities such as Dudley MBC. |
| BLPIO-410 | | Midlands Land Portfolio Ltd | 29/12/22 14:08 | Sites such as the one being promoted should be released from the Green Belt to help to meet the shortfall of employment land. | As the comment highlights, the NPPF requires all reasonable options to be examined before concluding that exceptional circumstances exist for changes to be made to Green Belt boundaries. The employment land shortfall isn't as great as the shortfall in the housing land, and so there is greater potential to accommodate the unmet need in locations within the city that do not involve Green Belt release. This includes exploring the potential for further supply within or adjoining the existing Core Employment |

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| | | | | | <p>Areas, and the potential for new Core Employment Areas to be designated. This further work needs to be completed before it can be concluded that Green Belt boundaries will need to be reviewed to meet the employment land shortfall.</p> |
| <p>BLPIO-349</p> | <p>Unknown</p> | <p>South Staffordshire District Council</p> | <p>20/12/22 17:16</p> | <p>The HEDNA is ambiguous as to whether South Staffordshire is within Birmingham's FEMA. South Staffordshire EDNA identified that there is no functional relationship. As such, South Staffordshire should not be expected to meet any of the shortfall, with the exception of the 53 hectares at the West Midlands Interchange site.</p> | <p>Despite the ambiguous wording within the HEDNA, the map on page 34 of Appendix 1 clearly shows South Staffordshire as within the FEMA. This is on the basis of it being located within the Greater Birmingham and Solihull LEP.</p> <p>The Issues & Options document also does not suggest that unmet needs should be addressed specifically within South Staffordshire. Instead it states that "discussions will also continue with authorities in the wider Housing Market Area to determine whether any employment land proposed in their forthcoming plans can meet any of the need arising from Birmingham". Whilst it is recognised that South Staffordshire does not at this stage think it is appropriate to make a contribution towards meeting Birmingham's development needs, beyond the 53 hectares already identified at the West Midlands Strategic Rail Freight Interchange, it is welcomed that South Staffordshire will</p> |

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| | | | | | continue to engage proactively with Birmingham City Council on this issue. |
| BLPIO-353 | Patrick Jervis | Lichfield District Council | 20/12/22 17:32 | Lichfield District has no identified capacity to accommodate any unmet employment land needs from Birmingham. | The lack of land supply within Lichfield District to accommodate unmet employment development needs from Birmingham is noted. |
| BLPIO-358 | Mike Dunphy | Bromsgrove District Council | 21/12/22 11:38 | Recognise the shortfall and support meeting the need within the city's boundary. If Green Belt land is required then this should also be within the city and not in other authority areas. | It is the City Council's intention to accommodate the shortfall within the non-Green Belt areas of the city. Only once all such potential opportunities have been exhausted will we consider approaching neighbouring authorities and/or reviewing the Green Belt boundary. |
| BLPIO-522 | | Druids Heath Consortium | 04/01/23 11:33 | Delivering housing development on existing employment land is likely to compound the employment land shortfall. | This option was included because there is a far bigger shortfall of housing land than the shortfall of employment land, and so utilising some poor quality and underutilised employment land might allow a balanced pattern of development. |
| BLPIO-542 | Mr David Joseph | Bloor Homes | 05/01/23 11:13 | No specific comment but an observation that if housing development is allowed on existing employment sites then this will exacerbate the shortfall of employment land. | This option was included because there is a far bigger shortfall of housing land than the shortfall of employment land, and so utilising some poor quality and underutilised employment land might allow a balanced pattern of development. |

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| BLPIO-546 | Mark Sullivan | CPRE Warwickshire | 05/01/23 12:07 | <p>There is enough employment land in the city and there is not a need to utilise land at the West Midlands Rail Freight Interchange which should be reserved for accommodating the Black Country's needs.</p> | <p>The evidence provided in the Housing and Economic Development Needs Assessment and the Housing and Economic Land Availability Assessment 2022, as articulated in the Issues & Options document, identifies that there is a shortfall of employment land in the city. This is also the case when the land at the West Midlands Rail Freight Interchange is included in the land supply. The Black Country authorities also have land supply available at the interchange site so there is no conflict between the two areas in utilising land in this location to address the unmet needs. It is appropriate under national planning for the City Council to consider at this stage of plan-making all potential sources of land supply, including where land could be released from the Green Belt.</p> |
| BLPIO-579 | IO Consultation Event - Stirchley | | 09/01/23 12:29 | Need more high quality employment. | Support for more high quality employment opportunities is noted and will be explored further in the Preferred Options document. |

Question 39 - Do you think we should allow more flexibility for employment land outside of the Core Employment Areas to change to other uses?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| <u>BLPIO-136</u> | Mr David Carter | Tyler Parkes | 05/12/22 09:49 | No, caution is required due to the shortfall of employment land. | Support for a more cautious approach is noted. This will be explored further at the preferred options stage. |
| <u>BLPIO-172</u> | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:33 | No views. | Noted. |
| <u>BLPIO-192</u> | IO Consultation Event - Sutton Cold | | 05/12/22 16:42 | Council need to make it easier to repurpose commercial space. | Comment noted. National changes to the Use Classes Order introduced in 2020 provides greater flexibility to change from a newsagent to a cafe, for example, without requiring planning permission. |
| <u>BLPIO-533</u> | | MEPC Limited | 04/01/23 16:49 | Support greater flexibility for employment land outside the Core Employment Areas but this needs to be balanced against the identified shortfall of employment land. | Support for greater flexibility outside the Core Employment Areas is noted and it is recognised that this needs to be considered carefully against the need to address the shortfall of employment land. |
| <u>BLPIO-50</u> | Mr Mike Mounfield | Colmore BID | 21/11/22 16:19 | Yes, flexibility required due to changing social circumstances. | Support for a more flexible approach to changing existing employment land to other |

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| | | | | | uses outside the Core Employment Areas is noted. |
| BLPIO-91 | Mr Thomas Ashley | Steenvlinder UK | 02/12/22 12:21 | Support greater flexibility to re-use undesignated employment land for residential development, where it would be unfeasible/unviable to retain it as employment land. Specific changes to policy TP20 should be to make explicit reference to residential uses being appropriate in certain locations and to remove the requirement for marketing evidence to be provided and rely on viability evidence instead. | Specific criteria would be required to identify what would be a suitable location for housing development. As in the current BDP, this is more appropriately set out within policies for housing development. The suggested approach of allowing suitable housing development on undesignated employment land by default would mean that here is no need for a policy to protect existing employment land. The City Council does not consider this to be appropriate given the identified shortfall of employment land and the unintended pressure that such a policy approach would have on viable and successful businesses that happen to fall outside of designated areas. It is therefore considered that there should continue to be a protection of employment land policy but the suggestion that viability evidence alone should be required in lieu of marketing evidence will be considered further. |
| BLPIO-115 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:30 | Yes, but based on policy criteria on a site-by-site basis. | The potential for a criteria based policy, including non-conforming uses, to guide decisions will be explored further at the Preferred Options stage. |

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| BLPIO-27 | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No comment | No comment noted. |
| BLPIO-43 | Mr Stuart Morgans | Sport England | 18/11/22 09:59 | Support greater flexibility, including recognising the economic benefits of sport and leisure developments on employment land. | There may be potential to consider the economic benefits of allowing existing industrial uses outside the Core Employment Areas to change to another employment generating use. This will be considered further within the Preferred Options document. |
| BLPIO-126 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 21:21 | No, more caution is required to protect employment land from housing development. | Support for a more cautious approach is noted. This will be explored further at the preferred options stage. |
| BLPIO-178 | Mr Matthew Williams | Volume Property | 05/12/22 15:02 | Not a straightforward yes or no answer. Some industrial areas are high quality and should be retained while others are poor and could be developed for other uses. The | We recognise that the most appropriate approach is not so clear cut. We will undertake further work to understand the quality and distribution of employment uses that are currently outside the Core |

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| | | | | requirement for active marketing should be dropped. | Employment Areas. If they are high quality and warrant protection then it might be appropriate to designate them within new Core Employment/Industrial Areas. The redevelopment of poorer quality areas can be managed through an appropriately worded policy, and your preference to remove the current requirement for evidence of two years marketing to be provided is noted. |
| BLPIO-323 | Paul Gilmour | Dale Farm | 14/12/22 15:57 | Yes, but not to any use that would then fall within the scope of PDR conversion to residential. | It may be more appropriate for some existing employment uses outside the Core Employment Areas to be developed for housing, as identified in the Housing Growth Options. In other cases residential redevelopment might not be appropriate and so there might need to be safeguards within policy to ensure that inappropriate housing isn't delivered subsequently via permitted development. |
| BLPIO-371 | Rosamund Worrall Unknown | Historic England | 21/12/22 13:07 | Ensure that Historic England's advice note on Site Allocations in Local Plans is referred to when assessing or selecting sites and areas for development. | Heritage assets and the historic environment are already considered in the HELAA methodology, but we will thoroughly review Historic England's advice note to ensure that all aspects of heritage and archaeology are properly considered in the process of identifying site allocations. |

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| BLPIO-542 | Mr David Joseph | Bloor Homes | 05/01/23 11:13 | No comment. | Noted. |
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Question 40 - What are your views on the proposed approach to offices?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
|---------------------------|-------------------------------|--|-------------------|--|--|
| BLPIO-172 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:33 | Little scope for office accommodation in Moseley. | There may be scope for office accommodation in Moseley. Our annual monitoring of planning approvals keeps track of where such potential exists and this data will inform the preparation of the new Local Plan. |
| BLPIO-243 | Mrs Michaela Moore | Hammerson - Bullring and Grand Central | 13/12/22 13:06 | A broader policy approach which sets criteria and locations for class E uses is supported, but there also needs to be flexibility for other uses. Offices should continue to be focused in central locations. | Support for a broader policy approach that maintains a focus on offices being located in centres and allows flexibility for uses to change according to market demand is noted. |
| BLPIO-294 | | Henley Investment Management Ltd | 14/12/22 12:00 | Policy should not restrict the flexibility provided by the GPDO and permitted development rights. | Local Plan policies will not be able address permitted development schemes, as these do not require planning permission. |
| BLPIO-533 | | MEPC Limited | 04/01/23 16:49 | A broader policy approach is supported that focuses on an expanded city core, but gives greater flexibility for a range of uses and not be restricted by specific geographical designations such as primary shopping areas. A longer term view should also be given to | It is recognised that a 'new normal' has not yet been achieved in working practices since the pandemic and so the City Council will keep any assumptions about office floorspace occupancy under review. This gives further grounds for a more flexible policy approach to class E uses. The potential for an expanded City Core will be |

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| | | | | the need for office developments and a flexible policy approach should apply to allow for further changes in the use of this floorspace following the pandemic. | considered further at the Preferred Options stage. |
| BLPIO-50 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:19 | Support broader policy approach and the 30% office floorspace discount applied in the HEDNA to take account of home working. | Support for the proposed approach to offices and a broader policy for commercial uses under class E is noted. |
| BLPIO-115 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:30 | Yes. Focus office developments on the city centre then on district centres. | Support for prioritising office developments in the City Centre and then in District Centres is noted, but the potential for this may be limited by the broad scope of class E uses. This will be explored further at the Preferred Options stage. |
| BLPIO-328 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:18 | Policy should not restrict the flexibility provided by permitted development and the GPDO. | Your comments are noted. Permitted development rights are set nationally and cannot be modified from Local Plan policy, although we will need to consider whether further changes to development proposals could be delivered at a later time through permitted development and if this would result in appropriate development then some safeguards may be needed within the Local Plan policies. |

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| BLPIO-415 | Calthorpe Estates | | 29/12/22 14:35 | Support a broad policy that complies with paragraph 81 of the NPPF. Flexibility required for office floorspace to allow the evolution and growth of innovation clusters. Keep under review the 30% discount in the HEDNA to take account of home working. | The points raised about ensuring flexibility in the policy approach, whilst creating an environment for businesses to invest, expand and adapt, are noted and will be considered as part of the drafting of appropriately worded policies. We will keep the 30% assumption under review and amend this if there is clear evidence that working patterns have changed. |
| BLPIO-27 | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No comment | No comment noted. |
| BLPIO-371 | Rosamund Worrall Unknown | Historic England | 21/12/22 13:07 | Consider the use of an Article 4 Direction if offices are integral to an area. | The government has made it harder to apply Article 4 Directions across broad areas, so we would only be able to use these where there is specific and identifiable evidence of a need to retain offices in certain parts of the city. The inclusion of offices in the broad Use Class E also makes this very challenging. |
| BLPIO-165 | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:02 | Yes, residential uses should be discouraged from being located close to commercial and night time uses. | We will need to explore whether there is potential for planning policy to limit or better manage residential developments in close proximity to established commercial and night-time uses. |

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| <u>BLPIO-189</u> | Gwyn James | Kier Highways | 05/12/22 16:23 | Agree with home working assumptions but also need to consider that much of the city's existing office floorspace requires significant investment to upgrade it to modern standards. | It is recognised that some existing office floorspace requires upgrading. This could be addressed within an appropriately worded policy that covers class E uses at a broad level. |
| <u>BLPIO-273</u> | Unknown | Westside Business Improvement District | 13/12/22 16:09 | Support a broader policy approach for class E uses. There is no need to have a specific policy to guide future decision of office developments in the new plan. | Support for a broader policy and not having a policy specifically focused on offices is noted. |
| <u>BLPIO-542</u> | Mr David Joseph | Bloor Homes | 05/01/23 11:13 | No comment. | Noted. |

Question 41 - Do you think there should be a policy to support the delivery of affordable workspace and other new ways of working?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
|---------------------------|-------------------------|------------------------------|-------------------|--|--|
| BLPIO-172 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:33 | Supportive of a policy, particularly where it supports start-up and grow-on businesses and aligns with elements of the City Plan such as net zero. | Support for such a policy is noted. We will explore the potential for this to encourage net zero carbon industries. |
| BLPIO-50 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:19 | Involve local non-profit business groups and Birmingham Property Services in the delivery of affordable workspaces. | We will aim to engage with such organisations and Birmingham Property Services as we consider potential policies for affordable workspace and new ways of working. |
| BLPIO-115 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:30 | Use ground floor commercial premises for affordable workspace in residential-led developments, particularly in the Jewellery Quarter. | The suggested approach of locating affordable workspaces in ground floor commercial units, in particular as part of residential-led mixed development schemes is noted. This may be appropriate to consider as part of a new policy for the city's network of centres. |
| BLPIO-175 | Miss Helen Davies | Transport for West Midlands | 05/12/22 14:39 | Support the proposed policy approach. Also need to consider the provision of adult/family hubs with digital access to support remote working. | Strong support for a proposed policy is noted. Including adult/family hubs within such a policy will be explored further. |

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| BLPIO-415 | Calthorpe Estates | | 29/12/22 14:35 | Support a policy relating to affordable workspace and new ways of working. | Support noted. |
| BLPIO-432 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:16 | Protect existing affordable workspaces from development. | We can consider making specific reference to existing affordable workspaces in a revised protection of employment land policy. |
| BLPIO-27 | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No comment | No comment noted. |
| BLPIO-110 | Mr Antony Whitehead | Our Town | 04/12/22 11:06 | Support a policy on co-working space and have made suggestions of venues including the Gracechurch Centre, Red Rose Centre, Rosie's site and Old Telephone Exchange. Any such spaces need to be well linked to transport infrastructure. | Support for co-working spaces within centres and connected to transport infrastructure is noted. |
| BLPIO-126 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 21:21 | Affordable motorsport-related workspace should be integrated in to Wheels Park. | The Wheels site is allocated for industrial and employment opportunities within the Bordesley Park Area Action Plan. As this plan has recently been adopted it is not subject to review and so the allocation will continue to apply. However this does not preclude affordable workspace from being brought forward on the site where it |

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| | | | | | would be related to its allocation for industrial or employment uses. |
| BLPIO-157 | DR Patrycja Rozbicka | Birmingham Live Music Project / Aston University | 05/12/22 12:07 | <p>Yes, policy on affordable workspace should include provision for creative clusters.</p> <p>The submission refers to a research paper and written evidence submitted to the Government's committee inquiry on the impact of Covid. It includes detailed information on the economic aspects of creative industries, including music.</p> | Support for a policy relating to affordable workspace, with a particular focus on creative clusters is noted. We will review the research paper and written evidence to the Covid-19 Committee Inquiry as part of the work to prepare the Preferred Options Document. |
| BLPIO-165 | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:02 | Yes, including for start-up and growth businesses and where there is alignment with the City Plan on aspects such as zero carbon. | Support for a policy relating to affordable workspace and new ways of working is noted. |
| BLPIO-273 | Unknown | Westside Business Improvement District | 13/12/22 16:09 | Yes, support such a policy. There is potential to deliver affordable workspace in the City Centre and at Westside in particular. | Support for such a policy is noted. The potential to identify locational opportunities for such workspace will be explored at the Preferred Options stage. |
| BLPIO-542 | Mr David Joseph | Bloor Homes | 05/01/23 11:13 | No comment. | Noted. |

Question 42 - Do you have any other suggestions or comments about the economy and employment land?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
|---------------------------|-------------------------|--|----------------|---|---|
| BLPIO-172 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:33 | No suggestions. | Noted. |
| BLPIO-243 | Mrs Michaela Moore | Hammerson - Bullring and Grand Central | 13/12/22 13:06 | Hammerson are willing to engage and contribute to the Retail and Leisure Needs Assessment. | Thank you for offering your support for the Retail and Leisure Needs Assessment. This document is now almost completed but there will be the opportunity to review and comment on the study when it is published in support of the Preferred Options Document. |
| BLPIO-294 | | Henley Investment Management Ltd | 14/12/22 12:00 | No broad policy for the provision of affordable workspace, but it should be considered on a site basis in lieu of affordable housing provision. | The preference for a policy that does not prescribe affordable workspace in all commercial development proposals is noted. It is not considered appropriate to pursue a policy approach that would prescribe the provision of affordable workspace in lieu of affordable housing as this would have a detrimental effect on the provision of affordable housing for which there is a very high need in the city. A Whole Plan Viability Study will however be undertaken to determine the potential for development schemes to contribute to the delivery of affordable workspace, affordable |

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| | | | | | housing and other wider benefits over the next plan period. |
| BLPIO-11 | Mr Lewis Lucas | | 04/11/22 08:45 | Need a policy to protect public houses. New leisure and entertainment, including food and drink, should be focused along canals. | Development proposals for facilities providing food and drink will be supported, subject to other planning policies. |
| BLPIO-115 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:30 | No suggestions. | Noted. |
| BLPIO-175 | Miss Helen Davies | Transport for West Midlands | 05/12/22 14:39 | Support policies on flexible working practices. Greater need to provide for logistic sectors, including ensuring good access to strategic transport networks and skilled local labour. Utilising forecasts and stakeholder engagement will be important in achieving this. | The suggestions are welcomed. We will continue to explore the potential for the new Local Plan policy to cover flexible working practices and have an emphasis on supporting the logistics sector. We will engage with WMCAs Employment and Skills Team and utilise the tools and data that you have developed where these will be useful in informing the policies in the new plan. |
| BLPIO-328 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:18 | No broad brush policy requirement for affordable workspace but it should be considered for some schemes in lieu of affordable housing provision. | Support for affordable workspace is noted but it may not be appropriate to allow this in lieu of affordable housing, for which there is a very identified need in the city as evidenced by the HEDNA. A whole plan viability study will be undertaken to determine the extent to which different |

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| | | | | | policy requirements could be sought from development schemes. |
| BLPIO-415 | Calthorpe Estates | | 29/12/22 14:35 | Calthorpe Estates supports a diverse range of sectors including office, retail, medical technology, leisure and education. There needs to be provision for these to grow further over the next plan period, particularly around the Bristol Road and River Rea corridors. | The different sectors that you have highlighted are noted and will be considered further in the work to prepare the Preferred Options Document. In particular we will explore whether there are certain locations in the city, such as those that you have identified, where there is a particular opportunity to support the growth and development of specific sectors. |
| BLPIO-432 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:16 | Protect existing businesses where networking is important, e.g. at Tyseley Energy Park. | We can consider emphasising the importance of existing economic networks as part of a new protection of employment land policy. |
| BLPIO-516 | | Midland Land Ltd | 04/01/23 10:46 | No further suggestions. Only a comment that economic growth should be delivered in accordance with the LHN. | Your comments are noted as observations of the evidence supporting the Issues and Options consultation document. The City Council will continue to aim to meet its local housing need and economic development needs as you have suggested. |
| BLPIO-27 | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No comment | No comment noted. |

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| BLPIO-126 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 21:21 | Alternative provision for Birmingham Wheels Park should be made, preferably elsewhere in the city, or in other local authority areas through the Duty to Cooperate. | Comments are noted and will be further considered through the Plan Review. |
| BLPIO-186 | Zaza Cooper | Mondelez International | 05/12/22 16:07 | Suggested that the current wording of the third paragraph of policy TP19 should be carried forward in to the new plan, with the exception of the last sentence relating to movement of freight and goods by rail. | The suggested wording is the same as that currently set out within policy TP19 but with the removal of the last sentence relating to the movement of freight and goods by rail. It is assumed that you consider this last sentence to conflict with your preceding comment regarding the operation of employment and industrial sites beyond the boundary of designations. We will consider this aspect of the policy wording further and amend it in the new plan if necessary. |
| BLPIO-323 | Paul Gilmour | Dale Farm | 14/12/22 15:57 | Utilise empty space above shops, with support from business rates. | Your suggestion to utilise empty space above shops is noted and will be explored further. Business rates cannot be modified through the Local Plan but we will work with |

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| | | | | | other teams in the council to determine the potential for this. |
| BLPIO-389 | Carl Mellor | Dudley Metropolitan Borough Council | 21/12/22 16:14 | <p>The loss of industrial uses to residential development needs to be considered in the context of the shortfall of employment land.</p> <p>Support the reference to utilising empty space above shops and suggest that this could also include policy support for upward extensions within centres.</p> <p>Offer to review the Retail & Leisure Needs Assessment in regard to any cross-boundary matters.</p> | Given the very high housing need calculation for the city it is appropriate to consider the redevelopment of some poorer quality and underutilised employment land, but as you have highlighted, care will be needed to ensure that this does not exacerbate the shortfall in employment land. Support for using empty space above shops is noted and we will discuss the Retail and Leisure Study with you as part of our continuing cross-boundary collaborative work. |
| BLPIO-410 | | Midlands Land Portfolio Ltd | 29/12/22 14:08 | Site being promoted is the same as the call for sites submission from RPS (43f069). The representation contains further detailed information to support this site submission. | Information relating to the site is noted and will be considered as part of the Call for Sites process. |
| BLPIO-590 | Councillor Julien Pritchard | Green Party Group | 09/01/23 17:06 | More mixed use development with employment and residential development delivered alongside each other where they would be compatible with each other. | Support for more mixed use development incorporating compatible housing and industrial uses is noted. We will explore this further, but it is anticipated that only very small scale light industrial uses falling |

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| | | | | | within class E are likely to be compatible with residential uses. |
| BLPIO-157 | DR Patrycja Rozbicka | Birmingham Live Music Project / Aston University | 05/12/22 12:07 | Greater protection is required for live music and creative industries, particularly in regard to new residential developments being permitted close to existing venues and in reflection that most venues are not owned by the occupiers but are rented or leased instead. The NPPF agent of change principles are applied inconsistently across different local authority areas. There also needs to be better coordination between licensing and planning. | We will give further consideration as to whether local policy needs to add further detail to the national agent of change policy, to ensure consistency in the way that this is applied to residential developments in close proximity to music venues in the city and to ensure that the links between licensing and planning are strengthened. |
| BLPIO-225 | | Aston Villa Football Club | 13/12/22 11:21 | Villa Park is a key destination for the city and wider West Midlands, it should be identified as a location where growth is supported. This should include night time economy uses such as the proposed Villa Live development. | The comment suggests that the objectives of policy TP25 should be carried forward in to the new plan and that Villa Park should be included in the list of tourism and cultural destinations where leisure and night time uses will be supported. This, and other potential destinations, can be explored further at the Preferred Options stage. |
| BLPIO-277 | IO Consultation Event - Moseley | | 13/12/22 16:15 | Prioritise attracting economic sectors with the potential for growth. More partnership working, | The comment about working in partnership with education and training providers to upskill the workforce is noted. This will be |

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| | | | | particularly with education and training providers. | particularly important for us to consider as we determine how current policy TP26 of the BDP will be taken forward in the future. We will also need to ensure that are prioritising economic sectors with the greatest potential to deliver growth in the most effective way. |
| BLPIO-522 | | Druids Heath Consortium | 04/01/23 11:33 | No further suggestions. Only a comment that economic growth should be delivered in accordance with the LHN. | Your comments are noted as observations of the evidence supporting the Issues and Options consultation document. The City Council will continue to aim to meet its local housing need and economic development needs as you have suggested. |
| BLPIO-542 | Mr David Joseph | Bloor Homes | 05/01/23 11:13 | No further suggestions. Only a comment that economic growth should be delivered in accordance with the LHN. | Your comments are noted as observations of the evidence supporting the Issues and Options consultation document. |

Question 43 - What would you like to see more of in your local high street/centre?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-172 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:33 | More diverse retail and a good range of transport options including by bike, walking or by bus. Car parking should still be provided but there should be a move to other modes of transport. | Support for the need for diversification and wider transport choices is noted. |
| BLPIO-192 | IO Consultation Event - Sutton Cold | | 05/12/22 16:42 | Sutton Coldfield Town Centre is in decline with loss of major shops and facilities such as the cinema. Redevelop the Gracechurch Centre and introduce more homes to the town centre. Support local enterprises and independent retail. Improve the library with a greater offer such as a cafe. Improve parking, outdoor lighting and sports facilities. | The RLNA Experian GOAD data reveals the vacancy rate in Sutton Coldfield as 20.3%, and BCC survey data for the whole centre shows a lower figure of 13.55%. The national average is currently 13.8%. The Council recognises the role of town centres are changing and that Sutton Coldfield Town Centre has been in decline over a number of years. The Council adopted a Town Centre Masterplan in 2021 in order to address challenges around the need to diversify the retail offer, attract more leisure, deliver town centre living and improve the environmental quality and connectivity within the centre. The masterplan provides a detailed strategy for the transformation of the town centre, directly addressing a number of the points raised by these representations. Following its adoption the |

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| | | | | | <p>Council has been working closely with partners, such as the Town Council and TfWM to deliver the masterplan. It is proposed that the overarching strategy and key projects within the masterplan will be carried forward in the revised local plan, including the proposals to redevelop the Red Rose Centre and Gracechurch Centre. This will provide an up-to-date statutory planning framework which the current SPD can hang off, allowing it to continue to provide the detail policy approach needed to support the regeneration of the town centre.</p> |
| BLPIO-232 | IO Consultation Event - Harborne | | 13/12/22 12:06 | Better library opening times. | Noted. |
| BLPIO-557 | IO Consultation Event - Erdington | | 06/01/23 16:50 | Concerned about the number of vacant units in Erdington High Street. Greater diversity of uses needed, including voluntary organisations and community uses such as schools, leisure centres and youth facilities. Wider improvements desired, including promotion of historic buildings. | Agree with comments. Policies will seek to maintain the vitality and viability local centres, ensure a diversity of uses and protect and enhance the historic environment. |

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| BLPIO-11 | Mr Lewis Lucas | | 04/11/22 08:45 | Pubs, bars, restaurants, cafes, street trees, outside seating, independent shops, shops. | The new Local Plan will need to refocus our centres as places to work, rest, and socialise, as well as being retail locations. |
| BLPIO-115 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:30 | Move the focus away from retail to other uses such as residential, hotels, co-working, childcare and community facilities, including medical services. Policy should ensure that hotels are in centres or well located for public transport. | The need for diversification of uses in centres including residential, leisure and community uses is noted. |
| BLPIO-415 | Calthorpe Estates | | 29/12/22 14:35 | A more innovative approach to centres is required, that recognises the different roles that each centre can play. For example the reuse of historic buildings in Edgbaston Village Centre. Need to ensure alignment with OFCP work. Encouraging the growth of unique sectors in each centre can have benefits for wider areas. Improvements are required to walking, cycling and public transport and the public realm. | The need for diversification in centres, and the recognition of roles is noted. |
| BLPIO-432 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:16 | More diverse uses in centres beyond retail, including shared/co-working spaces. | The need for diversification is noted, particularly with post-Covid and cost of living concerns. As the city looks to the future, we will need to reimagine the role of |

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| | | | | | our urban centres as places which offer more than just somewhere to shop. The new Local Plan will need to refocus our centres as places to work, rest, and socialise, as well as being retail locations. |
| BLPIO-27 | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | More green / SuDS features | Noted. |
| BLPIO-43 | Mr Stuart Morgans | Sport England | 18/11/22 09:59 | Identify sites in centres for sport and physical activity. | The need for promoting sites in established centres as suitable locations for sport and physical activity is noted. |
| BLPIO-110 | Mr Antony Whitehead | Our Town | 04/12/22 11:06 | Greater diversity of uses in Sutton Coldfield Town Centre with less retail and more community services, co-working spaces and leisure uses. These need to be delivered alongside transport and public realm improvements. | The need for diversification and more independent retail is noted. Planning permission for refurbishment of the cinema has been granted, and other opportunities for improvement will be explored. |
| BLPIO-270 | Miss Constantia Cooper-Jones | Resident Group/Resident | 13/12/22 15:52 | Protect local centres and improve social infrastructure. | The new Local Plan will need to focus on our centres as places to work, rest, and socialise, as well as being retail locations. |
| BLPIO-563 | IO Consultation Event - Perry Barr | | 06/01/23 17:08 | Viability of retail in Perry Barr a concern. Need more attractions and things to do, including outdoor events space and a bigger gym. | The RLNA Experian GOAD data reveals the vacancy rate in Perry Barr as 12%, and BCC survey data for the whole centre is 8.5%. This is below the average of 13.8%, and is |

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| | | | | | comparable with several other larger centres. However, the need for diversification is noted, particularly with post-Covid and cost of living concerns. |
| BLPIO-571 | IO Consultation Event - Ladywood | | 09/01/23 09:47 | More facilities for young people, including educational programmes. Safer leisure and sport facilities. | The need for diversification is noted, particularly for recreation/leisure and facilities for young people. |
| BLPIO-590 | Councillor Julien Pritchard | Green Party Group | 09/01/23 17:06 | Agree | Noted. |
| BLPIO-165 | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:02 | More diverse retail and more flexible parking and transport arrangements. | The need for diversification and more independent retail, and better parking and public transport is noted. |
| BLPIO-213 | IO Consultation Event - Northfield | | 08/12/22 10:17 | Northfield has been impacted by the relocation of Sainsburys and has a large number of vacant units. It needs a greater mixture of retail, including higher end chains rather than lower end budget shops. Existing public spaces and crime/public safety need improvement. Need more provision for young people. City centre is too built up with 60s/70s buildings now needing to be redeveloped. | The need for diversification and a better centre environment is noted. Our Future City Central Area Framework will set out a new vision for and continued regeneration of Birmingham City Centre. |

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| BLPIO-273 | Unknown | Westside Business Improvement District | 13/12/22 16:09 | Outdoor cafe culture and active frontages on side streets. | Noted. |
| BLPIO-277 | IO Consultation Event - Moseley | | 13/12/22 16:15 | Consider the viability of local centres. | The new Local Plan will need to refocus our centres as places to work, rest, and socialise, as well as being retail locations. The need for diversification is noted, particularly with post-Covid and cost of living concerns. As the city looks to the future, we will need to reimagine the role of our urban centres as places which offer more than just somewhere to shop. |
| BLPIO-542 | Mr David Joseph | Bloor Homes | 05/01/23 11:13 | No comment. | Noted. |
| BLPIO-579 | IO Consultation Event - Stirchley | | 09/01/23 12:29 | More local shops within neighbourhoods. Support independent businesses and a BID within Stirchley. More community facilities including, GPs, schools, police and fire stations. | The need for diversification and more independent retail is noted. A BID has been explored in the past, but not taken forward, however this does not rule out a Business association or BID in the future. |

Question 44 - Do you think we should have a policy which seeks to protect public houses, theatres, live music venues and night clubs from change of use?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
|----------------------------------|-------------------------|-------------------------------|-------------------|---|---|
| <u>BLPIO-172</u> | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:33 | Protect all arts, providing that they are in appropriate locations. | Protecting and enhancing the diverse leisure, recreation, arts and cultural facilities in the city where they meet local and wider needs will be important to Birmingham's economy. |
| <u>BLPIO-11</u> | Mr Lewis Lucas | | 04/11/22 08:45 | Protect pubs to attract and retain people in the city. | Protecting and enhancing the diverse leisure, recreation, arts and cultural facilities in the city where they meet local and wider needs will be important to Birmingham's economy. We would like to take a proactive approach to enabling and managing the evening and night-time economy. This could include considering whether to have a policy that seeks to protect public houses, theatres, live music venues and night clubs from change of use. |
| <u>BLPIO-50</u> | Mr Mike Mounfield | Colmore BID | 21/11/22 16:19 | Support protective policy, given the challenging economic circumstances that such uses have recently faced. | We would like to take a proactive approach to enabling and managing the evening and night-time economy. This could include considering whether to have a policy that seeks to protect public houses, theatres, |

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| | | | | | <p>live music venues and night clubs from change of use.</p> <p>We are also considering whether to have a policy which identifies where the clustering of night-time economy uses would be encouraged, or not encouraged, to help promote intensification and diversification of leisure and cultural uses while protecting local amenity and character.</p> |
| BLPIO-81 | Mr Nick Loveland | B:Music | 01/12/22 10:08 | <p>Support a protective policy. Night time economy uses are more important to the economy of centres now that more workers are home rather than office bases. Concerned about residential uses being permitted close to existing venues - need to apply a policy that reflects the agent of change principle in paragraph 187 of the NPPF.</p> | <p>The new Local Plan will need to refocus our centres as places to work, rest, and socialise, as well as being retail locations.</p> <p>Protecting and enhancing the diverse leisure, recreation, arts and cultural facilities in the city where they meet local and wider needs will be important to Birmingham's economy.</p> |
| BLPIO-115 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:30 | <p>Yes. They could be designated as Assets of Community Value.</p> | <p>We would like to take a proactive approach, which could include considering ACVs and whether to have a policy that seeks to protect public houses, theatres, live music venues and night clubs from change of use.</p> |

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| BLPIO-123 | Mr Robert Adey | | 04/12/22 21:11 | Ensure there are a range of transport options for people travelling in to Birmingham from elsewhere. | We would like to take a proactive approach to enabling and managing the evening and night-time economy, including support for the provision of public transport, and in particular evening services. |
| BLPIO-432 | Jon Morris | Acocks Green Focus Group | 29/12/22 16:16 | Supportive of having a policy. | Support noted. |
| BLPIO-27 | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No comment | Noted. |
| BLPIO-43 | Mr Stuart Morgans | Sport England | 18/11/22 09:59 | Yes, and also include sport and social clubs in accordance with agent of change principles in paragraph 187 of the NPPF. | Noted. |
| BLPIO-110 | Mr Antony Whitehead | Our Town | 04/12/22 11:06 | Protect pubs such as the Station and market them as part of wider regeneration proposals. | Protecting and enhancing the diverse leisure, recreation, arts and cultural facilities in Sutton Coldfield will be important to the local economy. |
| BLPIO-126 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community | 04/12/22 21:21 | Yes, and also include protection for sport and recreation facilities such as Wheels Park. | Protecting and enhancing the diverse leisure, recreation, arts and cultural facilities in the city where they meet local and wider needs is important to Birmingham's economy. The Wheels site is allocated for industrial and employment opportunities within the |

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| | | groups, organisations and businesses formerly operating at the site | | | Bordesley Park Area Action Plan. As this plan has recently been adopted it is not subject to review and so the allocation will continue to apply. |
| BLPIO-363 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:20 | Support the protection of these uses, in accordance with paragraph 93 of the NPPF. | Support noted. Protecting and enhancing the diverse leisure, recreation, arts and cultural facilities in the city where they meet local and wider needs will be important to Birmingham's economy. |
| BLPIO-371 | Rosamund Worrall Unknown | Historic England | 21/12/22 13:07 | Local Listing criteria should be refreshed alongside the draft plan. A historic environment policy could then be applied to protect such uses where they are identified as important. | We would like to take a proactive approach to enabling and managing the evening and night-time economy. This could include considering whether to have a policy that seeks to protect public houses, theatres, live music venues and night clubs from change of use. We can investigate how local listing and historic environment criteria can contribute. |
| BLPIO-78 | Mr Nick Reed | West Midlands Music Board | 29/11/22 15:23 | Support a protective policy. Night time economy uses are more important to the economy of centres now that more workers are home rather than office bases. Concerned about residential uses | The new Local Plan will need to refocus our centres as places to work, rest, and socialise, as well as being retail locations. Protecting and enhancing the diverse leisure, recreation, arts and cultural |

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| | | | | being permitted close to existing venues - need to apply a policy that reflects the agent of change principle in paragraph 187 of the NPPF. | facilities in the city where they meet local and wider needs will be important to Birmingham's economy. |
| BLPIO-157 | DR Patrycja Rozbicka | Birmingham Live Music Project / Aston University | 05/12/22 12:07 | Venues should be protected from change of use, both in terms of the venues themselves and also the change of use of adjoining premises. Small and grassroots music venues are a major attraction for visitors from elsewhere. Transport and other infrastructure should be enhanced to support this industry. Night-time economy impact assessments should be required for relevant change of use planning applications. | We would like to take a proactive approach to enabling and managing the evening and night-time economy. This could include considering whether to have a policy that seeks to protect public houses, theatres, live music venues and night clubs from change of use. |
| BLPIO-165 | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:02 | Protect all arts venues. Encourage live venues where there is no conflict with residential uses. | Protecting and enhancing the diverse leisure, recreation, arts and cultural facilities in the city where they meet local and wider needs will be important to Birmingham's economy. |
| BLPIO-273 | Unknown | Westside Business | 13/12/22 16:09 | Do not support a policy to protect these uses. National regulations are sufficient and there needs to be | Noted. |

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| | | Improvement District | | flexibility to convert these to other uses if they are no longer viable. | |
| <u>BLPIO-542</u> | Mr David Joseph | Bloor Homes | 05/01/23 11:13 | No comment. | Noted. |

Question 45 - Do you think we should have a policy which says where night-time uses should be located and where they should not be?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
|---------------------------|-------------------------|----------------------------------|-------------------|---|---|
| BLPIO-172 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:33 | Any concentration of night-time industries should deliver wider benefits such as improved safety and transport, and must not conflict with residential uses or multi-use centres. Detailed consultation required with stakeholders. | A vibrant and mixed evening and night time economy can introduce new activity and help valued cultural, recreational and social assets like pubs and music venues to be retained, but it can also have negative impacts on local residents and the local environment. Potential impacts need to be carefully managed and consultation is essential. |
| BLPIO-294 | | Henley Investment Management Ltd | 14/12/22 12:00 | Some limitations may be appropriate but the City Centre should be encouraged as a 24 hour city. Safety and transport are key considerations for the night time economy. | Noted. |
| BLPIO-27 | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No comment | Noted. |
| BLPIO-110 | Mr Antony Whitehead | Our Town | 04/12/22 11:06 | Support for the night-time economy in Sutton Coldfield, particularly at the Red Rose and Station Quarter. | Noted. |

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| <u>BLPIO-590</u> | Councillor Julien Pritchard | Green Party Group | 09/01/23 17:06 | The emphasis should be on limiting residential development close to night time uses. Acoustic protection and s106 contributions for noise insulation and protection measures at venues should be required where new residential schemes are permitted. | Noted. A vibrant and mixed evening and night time economy can introduce new activity and help valued cultural, recreational and social assets like pubs and music venues to be retained, but it can also have negative impacts on local residents and the local environment. Potential impacts need to be carefully managed and consultation is essential. |
| <u>BLPIO-11</u> | Mr Lewis Lucas | | 04/11/22 08:45 | Allow night-time uses in most areas but with a particular focus on the city centre and canal network. Need to ensure that local communities aren't negatively affected. | Comment noted. |
| <u>BLPIO-50</u> | Mr Mike Mounfield | Colmore BID | 21/11/22 16:19 | Support, and should be curated by the City Council and BIDs. | BCC has a role in supporting BIDs, and this will continue. |
| <u>BLPIO-81</u> | Mr Nick Loveland | B:Music | 01/12/22 10:08 | It's more nuanced than a yes/no answer. Clustering night time economy uses together is beneficial but they should also be encouraged in local areas elsewhere. | A vibrant and mixed evening and night time economy can introduce new activity and help valued cultural, recreational and social assets like pubs and music venues to be retained, but it can also have negative impacts on local residents and the local |

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| | | | | | <p>environment needs to be carefully managed.</p> <p>We would like to take a proactive approach to enabling and managing the evening and night-time economy. This could include considering whether to have a policy that seeks to protect public houses, theatres, live music venues and night clubs from change of use.</p> |
| BLPIO-115 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:30 | <p>Protect existing night-time uses from noise complaints arising from new development, particularly in the Gay Village. Consider also areas which might benefit from the night time economy due to heritage and cultural reasons but which may be at risk from development.</p> | <p>A vibrant and mixed evening and night time economy can introduce new activity and help valued cultural, recreational and social assets like pubs and music venues to be retained. Potential negative impacts on local residents and the local environment need to be carefully managed.</p> |
| BLPIO-328 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:18 | <p>Night time uses should limited in some locations but the City Centre should be enabled as a 24 hour city. Safety and transport are key considerations for night time uses.</p> | <p>Noted.</p> |

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| <p>BLPIO-78</p> | <p>Mr Nick Reed</p> | <p>West Midlands Music Board</p> | <p>29/11/22 15:23</p> | <p>It's more nuanced than a yes/no answer. Clustering night time economy uses together is beneficial but they should also be encouraged in local areas elsewhere.</p> | <p>A vibrant and mixed evening and night time economy can introduce new activity and help valued cultural, recreational and social assets like pubs and music venues to be retained, but it can also have negative impacts on local residents and the local environment needs to be carefully managed.</p> <p>We would like to take a proactive approach to enabling and managing the evening and night-time economy. This could include considering whether to have a policy that seeks to protect public houses, theatres, live music venues and night clubs from change of use.</p> |
| <p>BLPIO-101</p> | <p>The Tyler Parkes Partnership Ltd Gail Collins</p> | <p>West Midlands Police</p> | <p>02/12/22 18:53</p> | <p>Policy required to ensure that the night time economy is carefully managed. The policy should address crime and the fear of crime, access to public transport, good quality parking (meeting ACPO Park Mark accreditation), well managed premises, CCTV, crime and ASB associated with hot food takeaways/late night off-licences/ATMs and ensuring that</p> | <p>Policy content to address evening and night-time economy, including hot food takeaways, off-licences, ATMs, shisha lounges etc. management of crime and the fear of crime and ASB, safety considerations including CCTV and access to public transport, and good quality parking (e.g. meeting ACPO Park Mark accreditation).</p> |

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| | | | | shisha lounges are planned carefully. | |
| BLPIO-157 | DR Patrycja Rozbicka | Birmingham Live Music Project / Aston University | 05/12/22 12:07 | There is currently a greater concentration of venues in more deprived areas. Encouragement needs to be given to a more even spread of venues, but existing venues in all areas of the city need to be protected. | Protecting and enhancing the diverse leisure, recreation, arts and cultural facilities in the city where they meet local and wider needs will be important to Birmingham's economy. |
| BLPIO-165 | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:02 | Concentrations of night time uses should deliver wider enhancements to safety and transport and avoid conflicts with residential uses and multi-use centres. Detailed consultation with stakeholders in such areas should be required. | A vibrant and mixed evening and night time economy can introduce new activity and help valued cultural, recreational and social assets like pubs and music venues to be retained, but it can also have negative impacts on local residents so the potential impact on the local environment needs to be carefully managed. Clustering of night-time economy uses could support provision of public transport, in particular evening services and timetables. |
| BLPIO-273 | Unknown | Westside Business Improvement District | 13/12/22 16:09 | Modern construction and the use of planning conditions is sufficient to address any potential conflict between residential and night- | A vibrant and mixed evening and night time economy can introduce new activity and help valued cultural, recreational and social assets like pubs and music venues to be retained, but it can also have negative impacts on local residents and the local |

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| | | | | time uses. Avoid clustering of night time uses. | environment. Potential impacts need to be carefully managed and consultation is essential. |
| BLPIO-542 | Mr David Joseph | Bloor Homes | 05/01/23 11:13 | No comment. | Noted. |

Question 46 - What type of leisure and cultural activities would you like to see more of in the night-time economy?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
|---------------------------|--|-------------------------------|-------------------|---|---|
| BLPIO-172 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:33 | No views. | Noted. |
| BLPIO-11 | Mr Lewis Lucas | | 04/11/22 08:45 | Food and drink, indoor and outdoor entertainment - including on the street. | Comment noted. |
| BLPIO-115 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:30 | Greater diversity, including support for independent and pop-up food and drink businesses. | Support noted. |
| BLPIO-27 | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No comment | Noted. |
| BLPIO-101 | The Tyler Parkes Partnership Ltd Gail Collins | West Midlands Police | 02/12/22 18:53 | Policy required to ensure that the night time economy is carefully managed. The policy should address crime and the fear of crime, access to public transport, good quality parking (meeting ACPO Park Mark accreditation), well managed premises, CCTV, crime and ASB associated with hot food takeaways/late night off- | Policy content to address evening and night-time economy, including hot food takeaways, off-licences, ATMs, shisha lounges etc. management of crime and the fear of crime and ASB, safety considerations including CCTV and access to public transport, and good quality parking (e.g. meeting ACPO Park Mark accreditation). |

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| | | | | licences/ATMs and ensuring that shisha lounges are planned carefully. | |
| BLPIO-165 | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:02 | Small scale live venues that are not necessarily connected to religious or cultural buildings, or places serving alcohol. | The need for small scale venues is noted. |
| BLPIO-273 | Unknown | Westside Business Improvement District | 13/12/22 16:09 | Festivals and outdoor events at various times throughout the year, such as those already planned in Westside. | Noted. We would like to take a proactive approach to enabling growth in the evening and night-time economy. |
| BLPIO-542 | Mr David Joseph | Bloor Homes | 05/01/23 11:13 | No comment. | Noted. |

Question 47 - How can the night-time economy be better managed (e.g. noise, transport, safety etc)?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| <u>BLPIO-172</u> | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:33 | Night-time economy business should be responsible for managing the area, to be enforced through planning conditions. | Noted. |
| <u>BLPIO-27</u> | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No comment | Noted. |
| <u>BLPIO-110</u> | Mr Antony Whitehead | Our Town | 04/12/22 11:06 | Daytime/early evening uses such as the United Reform Church need to be insulated from night time economy uses. | Noted. |
| <u>BLPIO-11</u> | Mr Lewis Lucas | | 04/11/22 08:45 | It's ok as it is. | Comment noted. |
| <u>BLPIO-50</u> | Mr Mike Mounfield | Colmore BID | 21/11/22 16:19 | Night time economy champion and manager to be supported by the city council in collaboration with BIDs. | Noted. We would like to take a proactive approach to enabling and managing the evening and night-time economy. |

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| <p>BLPIO-81</p> | <p>Mr Nick Loveland</p> | <p>B:Music</p> | <p>01/12/22 10:08</p> | <p>Better public transport to support the night time economy, including making it safer (with additional staff and street wardens), cheaper and more extensive network with better maps and signage, night out park and ride hubs and provision for electric vehicles.</p> | <p>Agree that personal safety is important. Night-time economy uses could support provision of public transport, in particular evening services and timetables.</p> <p>Agree that public transport provision needs to be strengthened. The Birmingham Transport Plan 2031 outlines how the city’s transport system needs to be transformed to meet the challenges of the next decade. There is good bus coverage in Birmingham, but journey times can be unpredictable and provision unequal across the city and at different times of the day. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes. The West Midlands Enhanced Partnership Scheme for Buses (2022), committed local bus operators, the West Midlands local authorities and TfWM to work together to support improvements to bus services, with passengers benefitting from attractive and convenient bus services. Objectives include ‘Evolve a network to support a 24/7 thriving economy, connecting people to new and developing destinations and attractions’ and also ‘Creating a safe, secure and accessible mode for all’.</p> |
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| | | | | | EV charging and signing remain a priority for the council. As part of the work to support the Birmingham Transport Plan, a kerbside management strategy will be implemented. The council will continue to work with partners to improve the public safety of people travelling around the city. |
| BLPIO-115 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:30 | Enhance public transport and control car parking. Enhance safety, particularly in the Gay Village. | Clustering of night-time economy uses could support provision of public transport, in particular evening services. Safety concerns are noted. |
| BLPIO-78 | Mr Nick Reed | West Midlands Music Board | 29/11/22 15:23 | Better public transport to support the night time economy, including making it safer (with additional staff and street wardens), cheaper and more extensive network with better maps and signage, night out park and ride hubs and provision for electric vehicles. | Agree that personal safety is important. Night-time economy uses could support provision of public transport, in particular evening services and timetables. The Council would like to take a proactive approach to enabling and managing the evening and night time economy. The Council are considering whether a policy which encourages the clustering of night-time economy uses e.g public houses, theatres, live music venues and night clubs would be beneficial. This could support the provision of public transport, in particular evening services and timetables. The Council does not control bus fares, however we will work with partners and public transport operators to establish and manage the link between |

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| | | | | | parking costs and public transport fares. Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone. |
| BLPIO-101 | The Tyler Parkes Partnership Ltd Gail Collins | West Midlands Police | 02/12/22 18:53 | Policy required to ensure that the night time economy is carefully managed. The policy should address crime and the fear of crime, access to public transport, good quality parking (meeting ACPO Park Mark accreditation), well managed premises, CCTV, crime and ASB associated with hot food takeaways/late night off-licences/ATMs and ensuring that shisha lounges are planned carefully. | Policy content to address evening and night-time economy, including hot food takeaways, off-licences, ATMs, shisha lounges etc. management of crime and the fear of crime and ASB, safety considerations including CCTV and access to public transport, and good quality parking (e.g. meeting ACPO Park Mark accreditation). |
| BLPIO-157 | DR Patrycja Rozbicka | Birmingham Live Music Project / Aston University | 05/12/22 12:07 | Most of the city's night time economy is concentrated in the centre and south, meaning that people have to travel longer distances to access such venues. There is too much reliance on the private car for travel and so improvements to public transport are required. | Noted. |

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| <u>BLPIO-165</u> | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:02 | Greater responsibility for businesses to manage the wider area, enforced through planning conditions. | Noted. |
| <u>BLPIO-273</u> | Unknown | Westside Business Improvement District | 13/12/22 16:09 | Close working between the BID, City Council and West Midlands Police to provide night time wardens. | Noted. |
| <u>BLPIO-542</u> | Mr David Joseph | Bloor Homes | 05/01/23 11:13 | No comment. | Noted. |

Question 48 - What else can be done to encourage people to walk and cycle more and use their car less?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-28 | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | Greener walking / cycle routes - opportunity to utilise SuDS | Active travel facilities are a key priority for Birmingham’s Transport Plan and are essential to delivering a sustainable well-connected city. The Council will continue to develop cycle schemes and canal towpath improvements including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycling security. As a way of prioritising active travel in local neighbourhoods, the Council will improve wayfinding and ensure connectivity with public transport hubs. |
| BLPIO-151 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 10:59 | Enhancing the appearance and safety of the existing green and blue corridor and open space. | The Council recognise the opportunities that active travel corridors can provide for delivering green and blue infrastructure. The Birmingham Transport Plan puts pedestrians first with the commitment to create safer and healthy environments to make walking, cycling and active travel the natural choice for short journeys. Neighbourhoods will be designed for walking and cycling, making |

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| | | | | | areas more inclusive for those who cannot drive and enhance accessibility to the city's green and blue infrastructure. |
| BLPIO-167 | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:08 | <ul style="list-style-type: none"> To make a comprehensive public transport system reliable, efficient and cost-effective. Provide disincentives for car industry to continue to design bigger and bigger cars Increase the cost and difficulties for people to access to outsize cars. | Note the desire for Government intervention to tax cars according to their dimensions. Active travel facilities are a key priority for Birmingham's Transport Plan and are essential to delivering a sustainable well-connected city. The Council will continue to develop walking and cycling schemes including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes, places for people schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements. |
| BLPIO-275 | Unknown | Westside Business Improvement District | 13/12/22 16:13 | <ul style="list-style-type: none"> Provision of safe and attractive cycling routes in and out of the city centre to complement the existing CAZ strategy. | We are pleased to see that your comments align with the principles that guide our work. The Birmingham Local Plan will be fully aligned with the Birmingham Transport Plan Delivery Plan which will provide a programme of interventions that prioritise sustainable travel and reduce demand for travel by car. |
| BLPIO-336 | Diane Clarke (Town Planning Team) | Network Rail | 20/12/22 14:45 | Council need to contact ArchCo. re: railway arches. Local plan objectives need to be aligned with Network rail objectives. Rail | The Council welcome the comments and information from Network Rail in relation to rail freight facilities and railway arches. The Council recognises the value of rail freight |

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| | | | | <p>freight needs to be more prominent in the document due to environmental and sustainable importance. Future of rail freight sites needs additional discussion with Network Rail due to increasing interest in last mile delivery for parcel carriers and retailers including urban rail enabled distribution space.</p> | <p>and will continue to encourage and support sustainable freight movement.</p> |
| <p>BLPIO-390</p> | <p>Carl Mellor</p> | <p>Dudley Metropolitan Borough Council</p> | <p>21/12/22 16:20</p> | <ul style="list-style-type: none"> • Be aware of side effects of transport policies being migrated to neighbouring counties. • Upgrade active travel infrastructure. • Create a cycling link between : <ul style="list-style-type: none"> ○ Halesowen with Woodgate Valley(this then further connects to Birmingham city centre via the Queen Elizabeth hospital and | <p>We are pleased to see that your comments align with the principles that guide our work. The Birmingham Local Plan will be fully aligned with the Birmingham Transport Plan Delivery Plan which will provide a programme of interventions that prioritise sustainable travel and reduce demand for travel by car. The Council is going to continue to work with neighbouring councils including Dudley Metropolitan Borough Council, to achieve policy alignment, both as part of the WMCA and through bilateral relations.</p> |

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| | | | | <p>Birmingham University</p> <ul style="list-style-type: none"> ○ origin - sprint/bus rapid travel route. | |
| BLPIO-572 | IO Consultation Event - Ladywood | | 09/01/23 09:52 | <ul style="list-style-type: none"> • Canals are a big asset which could be used more • Through traffic on A38 in City centre should be subject to CAZ | The Council will continue to develop cycle schemes and canal towpath improvements including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs. The through traffic on the A38 is currently subject to CAZ charging. |
| BLPIO-591 | Councillor Julien Pritchard | Green Party Group | 09/01/23 17:08 | <ul style="list-style-type: none"> • Strengthen the wording of road space re-allocation policies for active travel. • Enhance the safety and quality of cycle infrastructure. | These issue are being addressed in the Birmingham Transport Plan Delivery Plan which is also informing the development of the BLP Connectivity Policies |
| BLPIO-12 | Mr Lewis Lucas | | 04/11/22 08:48 | More LTNs. More bike and scooter hire schemes. Bike hire to include toddler seats and trailers. More cycle lanes. More pedestrianisation. Secure areas to leave bikes (CCTV and Security Guard). | We are pleased to see that your comments align with the principles that guide our work. The Birmingham Local Plan will be fully aligned with the Birmingham Transport Plan Delivery Plan which will provide a programme of interventions that prioritise sustainable travel and reduce demand for travel by car. |

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| BLPIO-51 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:28 | More bikeshare and secure cycle parking. | Active travel facilities are a key priority for Birmingham’s Transport Plan and are essential to delivering a sustainable well-connected city. The Council will continue to develop cycle schemes and canal towpath improvements including new cycle routes along main commuter corridors, secure cycle parking, cycle hire schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycling security. As a way of prioritising active travel in local neighbourhoods, the Council will improve wayfinding and ensure connectivity with public transport hubs. |
| BLPIO-82 | Mr Nick Loveland | B:Music | 01/12/22 10:10 | <ul style="list-style-type: none"> • Increase bicycle parking/cycle hubs and cross city cycling corridors. • Better signage for active travel users. | Active travel facilities are a key priority for Birmingham’s Transport Plan and are essential to delivering a sustainable well-connected city. The Council will continue to develop cycle schemes and canal towpath improvements including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycling security and wayfinding. As a way of prioritising active travel in local |

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| | | | | | neighbourhoods, the Council will improve signage and ensure connectivity with public transport hubs. |
| BLPIO-116 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:37 | Improve safety, certainty of public transport and provision of cycle lanes. Public transport need to be improved in parallel with measures against cars to encourage the modal shift from cars. Stricter parking enforcement is needed. | The Birmingham Transport Plan 2031 outlines how the city's transport system needs to be transformed to meet the challenges of the next decade. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes. As a way of prioritising active travel in local neighbourhoods, the Council will improve wayfinding and ensure connectivity with public transport hubs. Managing demand through parking measures will also be used as a way to reduce car travel through availability, pricing and restrictions. Civil Enforcement Officers to address inappropriate parking are deployed every day throughout the city to all areas, with busier locations being visited more frequently. |
| BLPIO-207 | IO Consultation Event - Northfield | | 07/12/22 14:10 | Improve existing public transport provision and reduce roadwork. | Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes. More details on the bus proposals are included in TfWM's Strategic Vision for Bus. We are supporting Transport for West Midlands in their efforts to enhance local public transport services. We |

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| | | | | | will continue to invest in public transport priority through road space reallocation. |
| BLPIO-268 | Miss Constantia Cooper-Jones | Resident Group/Resident | 13/12/22 15:51 | Public transport provision needs to be improved and made more reliable. | The Council will work with partners such as Transport for West Midlands (TfWM) who work with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone. We are supporting Transport for West Midlands in their efforts to enhance local public transport services. |
| BLPIO-329 | Mr Paul Rouse | Lench's Trust | 14/12/22 16:20 | Segmenting the city centre can lead to unintended consequences of reducing the city's competitiveness and attractiveness as a business location. | The comments are noted. To facilitate a step change in how people travel, we will deliver of an integrated and sustainable transport network which prioritises walking, cycling and public transport. The Birmingham Transport Plan 2031 outlines how the city's transport system needs to be transformed to meet the challenges of the next decade. In addition to improving public transport, managing demand through parking measures will be used as a way to reduce car travel through availability, pricing and restrictions. The Council recognise the importance of the efficient delivery of goods and services. |

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| BLPIO-377 | Tammy Stokes | Sandwell Metropolitan Borough Council | 21/12/22 14:20 | The Local Plan should acknowledge that reallocation of road space and introduction of active travel/bus priority can only be successful if applied on a corridor basis and addressed at the conurbation level. | We are pleased to see that your comments align with the principles that guide our work. The Birmingham Local Plan will be fully aligned with the Birmingham Transport Plan Delivery Plan which will provide a programme of interventions that prioritise sustainable travel and reduce demand for travel by car. The Council is going to continue to work with neighbouring councils including SMBC, to achieve policy alignment, both as part of the WMCA and through bilateral relations. |
| BLPIO-416 | Calthorpe Estates | | 29/12/22 14:42 | Provision to some extent is needed for cars, which needs to be integrated into the resto of the transport system, with the park-and-ride provision being an example. | The comments are noted. The Birmingham Transport Plan 2031 outlines how the city's transport system needs to be transformed to meet the challenges and opportunities of the next decade including accommodating future growth. In addition to improving public transport, managing demand through parking measures will be used as a way to reduce car travel through availability, pricing and restrictions. The City's Parking SPD addresses this topic. Park and Ride provision will be considered where appropriate and where it meets out objectives. |
| BLPIO-457 | Ben Simm | National Highways | 30/12/22 12:45 | <ul style="list-style-type: none"> • Ensure alternatives to cars existing at the beginning for developments, and the existing bus/rail services | Prioritising sustainable transport and reducing the need to travel is a key element of the Birmingham Transport Plan and the emerging Birmingham Local Plan will fully |

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| | | | | <p>are viable as alternatives to cars.</p> <ul style="list-style-type: none"> To undertake a fully Strategic Transport Assessment that cover highway network and public/active transport provision to support the development of the local plan | <p>support this through land use policies that aim to increase density, support mixed land uses and restrict car availability and use. The Birmingham Local Plan will also promote and prioritise sites with high levels of accessibility by sustainable modes. Comment noted to undertake a fully Strategic Transport Assessment.</p> |
| <p>BLPIO-501</p> | <p>Craig Rowbottom</p> | <p>Arup</p> | <p>03/01/23 15:00</p> | <ol style="list-style-type: none"> The Plan should be clear what developers are expected to do to support growth. More linkages need to be made between decarbonisation of the movement network with Chapter 5 of the Plan. Clarify the definition and application of 15/20 minute neighbourhoods, if it is to be a policy requirement. | <ol style="list-style-type: none"> Detailed policy requirements will be set out at the next stage of the Plan. Agree with comments. Further detail in relation to how the 15/20 minute neighbourhood concept will be applied and implemented through Local Plan will be set out at the next stage of the Plan. |

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| <p>BLPIO-6</p> | <p>Mr John Bennett</p> | | <p>02/11/22 16:09</p> | <p>All barriers in Birmingham to be removed for active travel to ensure all types of personal mobility.</p> | <p>Active travel facilities are a key priority for Birmingham’s Transport Plan and are essential to delivering a sustainable well-connected city for everyone. The Council will continue to develop cycle schemes and canal towpath improvements including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs, whilst ensuring accessibility for all. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycling security. As a way of prioritising active travel in local neighbourhoods, the Council will improve wayfinding and ensure connectivity with public transport hubs.</p> |
| <p>BLPIO-18</p> | <p>Janelle Kolas</p> | | <p>04/11/22 09:54</p> | <p>Bicycle storage provision in neighbourhoods.</p> | <p>Active travel facilities are a key priority for Birmingham’s Transport Plan and are essential to delivering a sustainable well-connected city. The Council will continue to develop cycle schemes and canal towpath improvements including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycling security. As a way of</p> |

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| | | | | | prioritising active travel in local neighbourhoods, the Council will improve wayfinding and ensure connectivity with public transport hubs. |
| BLPIO-79 | Mr Nick Reed | West Midlands Music Board | 29/11/22 15:45 | <ul style="list-style-type: none"> • Increase bicycle parking/cycle hubs and cross city cycling corridors. • Better signage for active travel users. | Active travel facilities are a key priority for Birmingham's Transport Plan and are essential to delivering a sustainable well-connected city. The Council will continue to develop cycle schemes and canal towpath improvements including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycling security. As a way of prioritising active travel in local neighbourhoods, the Council will improve wayfinding and ensure connectivity with public transport hubs. |
| BLPIO-102 | The Tyler Parkes Partnership Ltd Gail Collins | West Midlands Police | 02/12/22 19:00 | Ensure homes and jobs are distributed near services and infrastructure. | Prioritising sustainable transport and reducing the need to travel is a key element of the Birmingham Transport Plan and the emerging Birmingham Local Plan will fully support this through land use policies that aim to increase density, support mixed land uses and restrict car availability and use. The Birmingham Local Plan will also promote and |

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| | | | | | prioritise sites with high levels of accessibility by sustainable modes. |
| BLPIO-190 | Gwyn James | Kier Highways | 05/12/22 16:24 | <ul style="list-style-type: none"> • Setup policies for the management of small powered transporters on highways and public realm. • Address active travel for people with mobility disabilities. | Reference in Policy TP37 |
| BLPIO-199 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 17:19 | <ul style="list-style-type: none"> • Resistance to road widening schemes • Reward schemes for people who use active travel. • Strengthen the wording of the road re-allocation policy. | We are pleased to see that your comments align with the principles that guide our work. Our objective is to reallocate road space and plan for sustainable transport in a way that reduces demand, the BLP will also support this. Addressing the Council's own way of travel is also a key priority for us at the moment. Workplace travel is also a priority for us and we will be addressing car travel for commuting by road space reallocation, prioritising sustainable modes as well as behavioural campaigns. |
| BLPIO-214 | IO Consultation Event - Yardley | | 08/12/22 10:56 | Reduce parking provision and setup more cycle stands. | A bold approach to parking in Birmingham has been set out as a key principle in the Birmingham Transport Plan, using parking as a means to manage demand for travel by car through availability, pricing and |

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| | | | | | restrictions. The City Council adopted the Birmingham Parking Supplementary Planning Document (SPD) in November 2021. The SPD forms part of the Council's planning framework and acts as a material consideration in the determination of planning applications. |
| BLPIO-222 | Chris Lowe | Push Bikes | 12/12/22 18:23 | <ul style="list-style-type: none"> • Should not assume that bikes are only for short trips. • Establish a cross-city network of attractive cycle routes, along with a fully integrated, high quality public transport system | We are pleased to see that your comments align with the principles that guide our work. Your suggestion for section 8.1 has been noted and we support the notion that bikes are not only for short trips. The Birmingham Transport Plan 2031 outlines how road space reallocation to sustainable travel corridors will create a safe and more attractive network for all users. |
| BLPIO-226 | | Aston Villa Football Club | 13/12/22 11:36 | Remark: promoting the club's vision for Villa Park (2022/06776/PA). | Welcome Aston Villa's commitment to sustainable travel. Active travel facilities are a key priority for Birmingham's Transport Plan and are essential to delivering a sustainable well-connected city. The Council will continue to develop walking / cycle schemes and improvements including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as |

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| | | | | | improving cycling security. As a way of prioritising active travel, the Council will improve wayfinding and ensure connectivity with public transport hubs. |
| BLPIO-234 | STEPHEN LYNE | | 13/12/22 12:10 | Improve bus services, bicycle lanes and disable friendly pavement. | The Birmingham Transport Plan 2031 outlines how the city's transport system needs to be transformed to meet the challenges of the next decade. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes. As a way of prioritising active travel in local neighbourhoods, the Council will improve wayfinding and ensure connectivity with public transport hubs. Neighbourhoods will be designed for walking and cycling making areas more inclusive for those who cannot drive. |
| BLPIO-245 | Mr David Scowcroft | Narrowboat Mr David | 13/12/22 13:26 | Need to focus on waterways themselves and not just towpaths. | We welcome and note your comments regarding maintenance of waterways in addition to canal towpaths. The Council would like to take a proactive approach to enabling and managing the evening and night time economy. This could include considering whether to have a policy that seeks to protect public houses, theatres, live music venues and night clubs from change of use. The Council are also considering whether to have a policy which encourages |

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| | | | | | <p>the clustering of night-time economy uses. This could prevent issues canal boat residents are facing such as volume of music at night and encroachment on to the towpath. The draft mooring policy supports new residential moorings where possible. Gas Street Basin is the centre point of Birmingham's Canal network and attracts a lot of visitors. When new development comes forward near the basin, preserving and enhancing this location is a priority. There is a need to balance the needs of canal boat residents and the night time economy; volume of music at night is an issue, as is encroachment on to the towpath. This issue of noise for canal boat residents applies equally to residential properties on land next to the canal in locations where the night time economy is particularly noticeable eg parts of the city centre. This is a matter for environmental services and development planning using planning conditions.</p> |
| BLPIO-278 | <p>IO Consultation Event - Moseley</p> | | <p>13/12/22 16:19</p> | <p>Increase investment for public transport and provision of cycle parking.</p> | <p>Reallocating road space and prioritising active travel are both key components of the Birmingham Transport Plan and the Birmingham Local Plan will be fully aligned with these. We are supporting Transport for West Midlands in their efforts to enhance local public transport services. We will</p> |

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| | | | | | <p>continue to invest in public transport priority through road space reallocation.</p> <p>Active travel facilities are a key priority for Birmingham’s Transport Plan and are essential to delivering a sustainable well-connected city. The Council will continue to develop cycle schemes and canal towpath improvements including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycling security.</p> |
| BLPIO-359 | Mike Dunphy | Bromsgrove District Council | 21/12/22 11:41 | <p>More details are needed for sprint rapid transit buses, cross-city bus/active travel routes and rail in the plan.</p> | <p>The Birmingham Transport Plan 2031 outlines how the city’s transport system needs to be transformed to meet the challenges of the next decade. The Birmingham Local Plan recognises the value of good connectivity within and beyond the city boundary. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes which extend beyond the local authority boundary. More details on the bus proposals are included in TfWM’s Strategic Vision for Bus. Further work is planned on the Midland Metro and new rail stations are being developed.</p> |

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| BLPIO-379 | Tammy Stokes | Sandwell Metropolitan Borough Council | 21/12/22 14:24 | <ol style="list-style-type: none"> 1. Introduce active travel and bus priority when reallocating road space for cross city trips 2. Parking measures requires complimentary incentives at the point of trip origin, which include neighbouring counties 3. Acknowledge implications of the city centre segmentation policies for neighbouring counties/authorities. | <p>We are pleased to see that your comments align with the principles that guide our work. The Birmingham Local Plan will be fully aligned with the Birmingham Transport Plan Delivery Plan which will provide a programme of interventions that prioritise sustainable travel and reduce demand for travel by car. The Council is going to continue to work with neighbouring councils including SMBC, to achieve policy alignment, both as part of the WMCA and through bilateral relations.</p> |
| BLPIO-397 | Mr Richard Forbes | Canal and Rivers Trust (Planning Manager) | 28/12/22 13:43 | <ul style="list-style-type: none"> • The canal and towpath need improvements in terms of access, signage, lighting, and provision of new access points, to encourage the use of the canal. • Apply the WPL fund city-wide instead of city-centre exclusive | <p>Comments are noted. The Council will review the WPL business case as part of the development work for any future scheme. The Birmingham Transport Plan puts pedestrians first with the commitment to create safer and healthy environments to make walking, cycling and active travel the natural choice for short journeys. The canal network provides valuable walking and cycling routes and we will encourage the use of the network with the introduction of cycle schemes and canal towpath improvements, this will include signage, lighting and access points. Neighbourhoods will be designed for walking</p> |

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| | | | | <ul style="list-style-type: none"> • Clarify how much of the improvement cost the WPL can cover. • Consider if the WPL should be used for improvements or to address additional stresses on the towpath network from future developments | and cycling, making areas more inclusive for those who cannot drive and enhancing accessibility to the city's green and blue infrastructure. |
| BLPIO-543 | Mr David Joseph | Bloor Homes | 05/01/23 11:30 | Allocate sites in locations which are, or can be made, sustainable. | Prioritising sustainable transport and reducing the need to travel is a key element of the Birmingham Transport Plan and the emerging Birmingham Local Plan will fully support this through land use policies that aim to increase density, support mixed land uses and restrict car availability and use. The Birmingham Local Plan will also promote and prioritise sites with high levels of accessibility by sustainable modes. |
| BLPIO-580 | IO Consultation Event - Stirchley | | 09/01/23 12:36 | <ul style="list-style-type: none"> • Kings Heath LTN hasn't worked • Enhance safety for existing cycle routes and reduce provision for cars. • Transport infrastructure support to new housing. | Reducing the need to travel is a key element of the Birmingham Transport Plan and the emerging Birmingham Local Plan will fully support this through land use policies that aim to increase density, support mixed land uses and restrict car availability and use. The Birmingham Local Plan will also promote and prioritise sites with high levels of accessibility by sustainable modes. The |

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| | | | | | <p>Places for People scheme is in line with the vision set out in the Birmingham Transport Plan to make active travel the first choice for local journeys, with cars no longer dominating street life around homes and schools. It is critical if we are to address transport's contribution to the climate emergency and meet our net zero commitments.</p> |
| <p>BLPIO-5</p> | <p>Mr Grant Bright</p> | | <p>31/10/22 21:32</p> | <p>Strict ban for parking on footways.</p> | <p>HM Government ran a consultation on proposed options to tackle pavement parking at a local authority or national level between August and November, 2020. This considered three options:</p> <ol style="list-style-type: none"> 1. Improving the Traffic Regulation Order (TRO) process, under which local authorities can already prohibit pavement parking. 2. A legislative change to allow local authorities with civil parking enforcement powers to enforce against 'unnecessary obstruction of the pavement'. 3. A legislative change to introduce a London-style pavement parking prohibition throughout England. |

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| | | | | | <p>Birmingham City Council responded to this consultation in support of Option 3, which would see a blanket pavement parking prohibition implemented throughout the country, but giving Local Authorities to wave this in specific local cases where there may be practical implications.</p> <p>Birmingham City Council eagerly awaits the publication of the desired course of action by HM Government on this issue.</p> |
| BLPIO-64 | Mr Andrew Lightstone | DP9 Ltd | 25/11/22 17:52 | <p>Instead of focusing primarily 'vehicle deterrent' approach, investment strategy that focusses on enhancing connections between larger site allocations, economic centres, town centres and opportunity areas is needed, so that the improved public realm is attractive enough for people to select walking over cars.</p> | <p>Reducing the need to travel is a key element of the Birmingham Transport Plan and the emerging Birmingham Local Plan will fully support this through land use policies that aim to increase density, support mixed land uses and restrict car availability and use. The Birmingham Local Plan will also promote and prioritise sites with high levels of accessibility by sustainable modes. Public spaces and active travel provision will take account of the most vulnerable road users, incorporating rest areas, reducing unnecessary clutter, and providing accessible wayfinding information.</p> |
| BLPIO-137 | Mr David Carter | Tyler Parkes | 05/12/22 09:52 | <p>Provide an attractive, well maintained public realm.</p> | <p>The Birmingham Transport Plan puts pedestrians first with the commitment to create safer and healthy environments to make walking, cycling and active travel the</p> |

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| | | | | | <p>natural choice for short journeys. Neighbourhoods will be designed for walking and cycling and the Council will improve public realm, wayfinding and ensure connectivity with public transport hubs throughout the city. The city centre of Birmingham will be transformed through the creation of a network of pedestrianised streets and public spaces. People will be prioritised in the city centre to support walking and cycling as the main means of getting around. This will be achieved by redirecting traffic flows to discourage through trips by private vehicles, developing new public squares, parks, and wide, level, traffic-free boulevards, and improving road crossings. The result will be a vibrant city centre environment, which will allow people to meet, relax and take time to enjoy the sights.</p> |
| <p>BLPIO-169</p> | <p>Miss Helen Davies</p> | <p>Transport for West Midlands</p> | <p>05/12/22 13:13</p> | <ol style="list-style-type: none"> 1. Greater mixed use and higher density developments 2. Require development of transport masterplans and joint land use and transportation strategy, | <ol style="list-style-type: none"> 1. Comment noted 2. Comment noted and agreed 3. Comment noted. 4. These issue are being addressed in the Birmingham Transport Plan Delivery Plan which is also informing the development of the BLP Connectivity |

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| | | | | <p>where clusters of re-development are planned</p> <ol style="list-style-type: none"> 3. Brownfield first approach that focus on areas that are close to existing transport links. 4. Acknowledge and align with regional and national transport investment program (CRSTS, levelling up fund, BSIP, LCWIP etc.), frameworks and strategies (e.g., Key Route Network Action Plan) for the promotion of an integrated transport system and the reallocation of road space 5. Acknowledge the wider cumulative impacts of development along key transport corridors and growth areas. 6. ‘Vision and Objectives’ section (under objective 1) of the plan should include a bullet point which supports measures to | <p>Policies and LTP Area Strategy for Birmingham.</p> <ol style="list-style-type: none"> 5. Comment noted and agreed 6. Objective 9 will be updated to reference decarbonisation of transport network 7. These issues are being addressed in the Birmingham Transport Plan Delivery Plan which is also informing the development of the BLP Connectivity Policies and LTP Area Strategy for Birmingham. 8. These issues are being addressed in the Birmingham Transport Plan Delivery Plan which is also informing the development of the BLP Connectivity Policies and LTP Area Strategy for Birmingham. 9. These issues are being addressed in the development of the BLP Connectivity Policies aligned to the principles of the Birmingham Transport Plan. 10. This refers to ebikes rather than private cars 11. Notes and agreed |
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| | | | | <p>decarbonise the transport network</p> <p>7. Use technology and transport information to support micromobility, ZEVs and CAV (5G networks needed)</p> <p>8. Enhance the quality and safety of the existing active travel infrastructure</p> <p>9. More details on how to require developments to ensure transport retrofitting can take place.</p> <p>10. Section 8.8: Elaborate 'cycle hire schemes incorporating electric vehicles'</p> <p>11. Section 8.13: Alteration of text.</p> | |
| BLPIO-173 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:50 | <ul style="list-style-type: none"> • Provide reliable, efficient and cost-effective alternatives to cars. • Enhance safety of active travel routes | The Birmingham Transport Plan 2031 outlines how the city's transport system needs to be transformed to meet the challenges of the next decade. The Birmingham Local Plan recognises the value of good connectivity within and beyond the city boundary. Several |

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| | | | | <ul style="list-style-type: none"> • Limit car storage of new developments and control the in/out/through movement of HGV in the city centre. • Ringfence revenue for public realm and transport improvements. | <p>bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes which extend beyond the local authority boundary. More details on the bus proposals are included in TfWM's Strategic Vision for Bus. Further work is planned on the Midland Metro and new rail stations are being developed.</p> <p>The Council does not control bus fares, however we will work with partners and public transport operators to establish and manage the link between parking costs and public transport fares. Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone. We are supporting Transport for West Midlands in their efforts to enhance local public transport services. We will continue to invest in public transport priority through road space reallocation.</p> <p>In addition to improving public transport, managing demand through parking measures will be used as a way to reduce car travel through availability, pricing and restrictions. The City's Parking SPD addresses parking demand for new developments.</p> <p>Active travel facilities are a key priority for Birmingham's Transport Plan and are</p> |
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| | | | | | <p>essential to delivering a sustainable well-connected city. The Council will continue to develop cycle schemes and canal towpath improvements including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycling security and safety. As a way of prioritising active travel in local neighbourhoods, the Council will improve wayfinding and ensure connectivity with public transport hubs.</p> <p>Comment to ringfence revenue for public realm and transport improvements noted.</p> |
| BLPIO-202 | IO Consultation Event - Sutton Cold | | 06/12/22 10:21 | improve the pricing, frequency, and connection between different public transport modes. | <p>The Council does not control bus fares, however we will work with partners and public transport operators to establish and manage the link between parking costs and public transport fares. Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone.</p> |

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| BLPIO-244 | Mrs Michaela Moore | Hammerson - Bullring and Grand Central | 13/12/22 13:18 | <p>Reducing car use and dominance does not equal eliminating private car uses entirely, the long term transition to EVs and car sharing will still require car parking. Public transport might be unreliable and have low accessibility for disabled people.</p> | <p>The comments are noted. The Birmingham Transport Plan 2031 outlines how the city’s transport system needs to be transformed to meet the challenges and opportunities of the next decade including accommodating future growth. In addition to improving public transport, managing demand through parking measures will be used as a way to reduce car travel through availability, pricing and restrictions. The City’s Parking SPD addresses electric vehicle charging and the City Council are currently rolling out a network of publicly accessible charge points across the city.</p> |
| BLPIO-253 | IO Consultation Event - Bham Lib | | 13/12/22 14:10 | <ul style="list-style-type: none"> • Expand the network and improve service quality of trains. • More reliable and affordable public transport • Bicycle storage provision | <p>The Council will continue to work with Transport for West Midlands (TfWM) who work with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone. The Council does not control bus fares, however we will work with partners and public transport operators to establish and manage the link between parking costs and public transport fares.</p> <p>Active travel facilities are a key priority for Birmingham’s Transport Plan and are essential to delivering a sustainable well-connected city. The Council will continue to develop cycle schemes and canal towpath</p> |

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| | | | | | improvements including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycling security. |
| BLPIO-295 | | Henley Investment Management Ltd | 14/12/22 12:04 | Need to carefully consider the unintended consequences of the proposal of segmenting the city centre, particularly for Birmingham's competitiveness and attractiveness as a business location. | The comments are noted. To facilitate a step change in how people travel, we will deliver of an integrated and sustainable transport network which prioritises walking, cycling and public transport. The Birmingham Transport Plan 2031 outlines how the city's transport system needs to be transformed to meet the challenges of the next decade. In addition to improving public transport, managing demand through parking measures will be used as a way to reduce car travel through availability, pricing and restrictions. The Council recognise the importance of the efficient delivery of goods and services. |
| BLPIO-378 | Tammy Stokes | Sandwell Metropolitan Borough Council | 21/12/22 14:22 | <ol style="list-style-type: none"> 1. Introduce active travel and bus priority when reallocating road space for cross city trips 2. Parking measures requires complimentary incentives | We are pleased to see that your comments align with the principles that guide our work. The Birmingham Local Plan will be fully aligned with the Birmingham Transport Plan Delivery Plan which will provide a programme of interventions that prioritise sustainable |

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| | | | | <p>at the point of trip origin, which include neighbouring counties.</p> <p>3. Acknowledge implications of the city centre segmentation policies for neighbouring counties/authorities.</p> | <p>travel and reduce demand for travel by car. The Council is going to continue to work with neighbouring councils including SMBC, to achieve policy alignment, both as part of the WMCA and through bilateral relations.</p> |
| BLPIO-426 | Jane Field | Environment Agency | 29/12/22 15:40 | <p>Enhance the safety and quality of active travel network, re-naturalising of the watercourse through the city.</p> | <p>The Birmingham Transport Plan puts pedestrians first with the commitment to create safer and healthy environments to make walking, cycling and active travel the natural choice for short journeys. The canal network provides valuable walking and cycling routes and we will encourage the use of the network with the introduction of cycle schemes and canal towpath improvements, this will include signage, lighting and access points. Neighbourhoods will be designed for walking and cycling, making areas more inclusive for those who cannot drive and enhancing accessibility to the city's green and blue infrastructure.</p> |
| BLPIO-462 | Emily Barker | Worcestershire County Council | 30/12/22 13:10 | <ul style="list-style-type: none"> Ensure adequate highway and transport infrastructure are provided | <p>The Council will ensure that adequate highway and transport infrastructure are provided for new growth. The Birmingham Local Plan recognises the value of good connectivity within and beyond the city</p> |

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| | | | | <p>for new growth in Birmingham</p> <ul style="list-style-type: none"> Keep WCC engaged to determine any potential impacts on the county's transport network and identify any necessary infrastructure improvements to be included in the Infrastructure Delivery Plan. | <p>boundary. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes which extend beyond the local authority boundary. More details on the bus proposals are included in TfWM's Strategic Vision for Bus. Further work is planned on the Midland Metro and new rail stations are being developed. The Council will continue to engage WCC and identify necessary infrastructure improvements for inclusion in the IDP.</p> |
| BLPIO-534 | | MEPC Limited | 04/01/23 16:56 | <p>Additional infrastructure should be delivered through partnership working and with clear funding identified.</p> | <p>We welcome your comments and agree with the NPPF guidance. The Council will continue to work in partnership with the relevant bodies.</p> |
| BLPIO-550 | Mr Antony Whitehead | Our Town | 05/01/23 15:57 | <p>Various comments relating to measures contained within the Sutton Coldfield Masterplan.</p> <p>Support implementation of the masterplan and landowners (including BCC) and Town Centre Regeneration Partnership will be key to this. Greater enforcement of car parking required.</p> | <p>Your detailed comments on approaches to encourage increased uptake of active travel and public transport are noted. We note your support for the Birmingham Transport Plan approach, and your interest in the emerging Sutton Gateway CRSTS Major Scheme. We hope that you will continue to engage with the City Council as these initiatives are developed as part of public engagement activities in due course.</p> |

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| <p>BLPIO-558</p> | <p>IO Consultation Event - Erdington</p> | | <p>06/01/23 16:57</p> | <p>Better use of canals as in Amsterdam.</p> <p>Parking problems on streets in Erdington centre and around station and schools.</p> | <p>The canal network provides valuable walking and cycling routes and we will encourage the use of the network with the introduction of cycle schemes and canal towpath improvements, this will include signage, lighting and access points. Neighbourhoods will be designed for walking and cycling, making areas more inclusive for those who cannot drive and enhancing accessibility to the city's green and blue infrastructure.</p> |
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Question 49 - How can public transport be improved so that more people will use it?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-12 | Mr Lewis Lucas | | 04/11/22 08:48 | More trams. | Further work is planned on the Midland Metro and new rail stations are being developed. |
| BLPIO-51 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:28 | Public transport to be regular, reliable, clean and cheap | <p>Agree that public transport provision needs to be strengthened. There is good bus coverage in Birmingham, but journey times can be unpredictable and provision unequal across the city and at different times of the day. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes which extend beyond the local authority boundary. More details on the bus proposals are included in TfWM’s Strategic Vision for Bus. Further work is planned on the Midland Metro and new rail stations are being developed.</p> <p>The Council does not control bus fares, however we will work with partners and public transport operators to establish and manage the link between parking costs and public transport fares. Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport</p> |

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| | | | | | is: safe, reliable, affordable and accessible for everyone. |
| BLPIO-82 | Mr Nick Loveland | B:Music | 01/12/22 10:10 | Free or highly subsidised PT at off peak times. Collaborative ideas regarding the use of public transport. | The Council would like to take a proactive approach to enabling and managing the evening and night time economy. The Council are considering whether to have a policy which encourages the clustering of night-time economy uses e.g public houses, theatres, live music venues and night clubs. This could support the provision of public transport, in particular evening services and timetables. The Council does not control bus fares, however we will work with partners and public transport operators to establish and manage the link between parking costs and public transport fares. Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone. |
| BLPIO-116 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:37 | Improve safety, quality and reliability, and reduce the cost of public transport. Support low earners on public transport. Improve public transport while discouraging car use to provide alternative options for users. | Agree that public transport provision needs to be strengthened. There is good bus coverage in Birmingham, but journey times can be unpredictable and provision unequal across the city and at different times of the day. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes. The Council does |

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| | | | | | not control bus fares, however we will work with partners and public transport operators to establish and manage the link between parking costs and public transport fares. Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone. |
| BLPIO-207 | IO Consultation Event - Northfield | | 07/12/22 14:10 | Improve transport link (tram and metro) at Frankley like Handsworth. | The comments are noted. The Birmingham Transport Plan 2031 outlines how the city's transport system needs to be transformed to meet the challenges and opportunities of the next decade including accommodating future growth. In addition to improving public transport, managing demand through parking measures will be used as a way to reduce car travel through availability, pricing and restrictions. Further work is planned on the Midland Metro in order to improve the service and new rail stations are being developed. |
| BLPIO-416 | Calthorpe Estates | | 29/12/22 14:42 | <ul style="list-style-type: none"> • More investment on public transport and active travel to make these modes safe, affordable alternatives to private car. • Partnership between WMCA, BCC, government | <ul style="list-style-type: none"> • Birmingham City Council will continue to support Transport for West Midlands in their efforts to enhance local public transport services. • It is agreed that partnership between the WMCA, BCC and government agencies is essential. BCC regularly attends West Midlands Rail Executive |

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| | | | | <p>agencies and developers should be encouraged</p> <ul style="list-style-type: none"> • Clarify how S106 and CIL contributions are used to improve public transport in developing policies for allocations • The location of Calthorpe Estate has the potential to strengthen important interchanges within the city to improve connections between neighbourhoods outside of the middle ring road, given the transport infrastructure in its proximity. | <p>(WMRE) and Enhanced Partnership Reference Group meetings to coordinate specification and delivery of across the region.</p> <ul style="list-style-type: none"> • Improved connectivity, including access to public transport and improved public realm, will be secured through S106 and/or CIL in line with published policies where appropriate. S106 regulations will ensure contributions are directly related to the development, necessary and fair and reasonable. |
| BLPIO-501 | Craig Rowbottom | Arup | 03/01/23 15:00 | <ol style="list-style-type: none"> 1. Consider modes that enhance micro-mobility in the plan. 2. More could be said on parking controls as they can help reduce car reliance. | <ol style="list-style-type: none"> 1. These issue are being addressed in the Birmingham Transport Plan Delivery Plan which is also informing the development of the BLP Connectivity Policies 2. The Birmingham Transport Plan 2031 outlines how the city’s transport system needs to be transformed to meet the challenges and opportunities of the next decade including accommodating future growth. In addition to improving public |

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| | | | | <p>3. Expand/strengthen the CAZ</p> <p>4. The Plan should support the development of a more integrated ticketing system</p> | <p>transport, managing demand through parking measures will be used as a way to reduce car travel through availability, pricing and restrictions. The City's Parking SPD addresses electric vehicle charging and the City Council are currently rolling out a network of publicly accessible charge points across the city. The council will also be developing a kerb-side parking strategy that will inform the development of the BLP Connectivity Policies.</p> <p>3. These issue are being considered as part of the Birmingham Transport Plan Delivery Plan which is also informing the development of the BLP Connectivity Policies</p> <p>4. The Birmingham Transport Plan highlights that shared mobility services have the potential to complement Birmingham's core transport system by providing coverage in areas and during times of the day/ week that are not serviced by tram or bus. Mobile applications, and smart integrated ticketing has the potential to make it simpler and easier, particularly for people with disabilities, to book and pay for transport with a single transaction, ensure best value for money and support journeys that combine several modes. In addition, innovative mobility services need to allow all citizens to</p> |
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| | | | | | <p>access benefit from them, and not perpetuate existing access barriers to mobility and opportunities. Especially when it comes to digital access, innovative mobility services need to be inclusive in order to avoid the further exclusion of segments of the society with limited or no access to digital services. These issue are being considered as part of the Birmingham Transport Plan Delivery Plan which is also informing the development of the BLP Connectivity Policies.</p> |
| <p>BLPIO-565</p> | <p>IO Consultation Event - Perry Barr</p> | | <p>06/01/23 17:13</p> | <ul style="list-style-type: none"> • More investment on public transport. • Enable cars to use bus lanes outside their operation times. • Need cameras at box junctions to stop incursions and improve traffic flow | <p>Birmingham City Council has applied to HM Government for powers to enforce moving traffic contraventions, including banned left and right turns at junctions. Should this application be successful, the Council will consider the case for installing camera enforcement at locations where poor compliance with Traffic Regulation Orders is causing a safety issue. This would be subject to all other infrastructure improvements having been exhausted which could be considered to improve compliance.</p> <p>The majority of Bus Lanes in Birmingham operate on a 24 hour basis. One of the four principles of the adopted Birmingham Transport Plan is the reallocation of road space away from general traffic, recognising</p> |

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| | | | | | <p>that this is necessary to encourage modal shift away from private car use, as one of the most spatially inefficient forms of transport. As this suggestion contravenes this principle, Birmingham City Council would not support bus lanes being used in this way. Instead, the City Council is working closely with Transport for West Midlands to increase bus frequencies and operating times, so that bus lane infrastructure is more intensively used over time, aligned with increased public transport service provision.</p> <p>The Birmingham Transport Plan 2031 outlines how the city's transport system needs to be transformed to meet the challenges of the next decade. The Birmingham Local Plan recognises the value of good connectivity within and beyond the city boundary. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes which extend beyond the local authority boundary. More details on the bus proposals are included in TfWM's Strategic Vision for Bus. Further work is planned on the Midland Metro and new rail stations are being developed.</p> |
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| <u>BLPIO-28</u> | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No specific comments | Noted |
| <u>BLPIO-167</u> | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:08 | Bus services integration, so that the services and routes are driven by need than profit | Agree that public transport provision needs to be strengthened. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes. The West Midlands Enhanced Partnership Scheme for Buses (2022), committed local bus operators, the West Midlands local authorities and TfWM to work together to support improvements to bus services, with passengers benefitting from attractive and convenient bus services. Objectives include 'Evolve a network to support a 24/7 thriving economy, connecting people to new and developing destinations and attractions' and also 'Creating a safe, secure and accessible mode for all'. The council will continue to support local rail and will maintain support for the building of the Camphill Chords. Disincentives for the car industry to design bigger cars are beyond the scope of the local plan document. |
| <u>BLPIO-231</u> | IO Consultation Event - Harborne | | 13/12/22 12:03 | Future for canals and travel opportunities | Active travel facilities are a key priority for Birmingham's Transport Plan and are essential to delivering a sustainable well- |

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| | | | | | connected city. The Council will continue to develop cycle schemes and canal towpath improvements including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycling security. |
| BLPIO-275 | Unknown | Westside Business Improvement District | 13/12/22 16:13 | Improve the frequency and duration of bus services by taking over bus companies. | We agree that public transport provision needs to be strengthened. There is good bus coverage in Birmingham, but journey times can be unpredictable and provision unequal across the city and at different times of the day. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes. The Council does not control bus fares, however we will work with partners and public transport operators to establish and manage the link between parking costs and public transport fares. Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone. The decision to use existing powers to bring bus services under local control lies with the West Midlands Combined Authority. We |

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| | | | | | acknowledge the potential benefits of a franchised model and we will support any decision that speeds up the delivery of the Birmingham Transport Plan. |
| BLPIO-390 | Carl Mellor | Dudley Metropolitan Borough Council | 21/12/22 16:20 | Consider the whole trip (origins and destinations beyond the boundary of Birmingham as well) when setting out policies and investments for public transport and micro mobility. | The Council is going to continue to work with neighbouring councils including Dudley Metropolitan Borough Council, to achieve policy alignment, both as part of the WMCA and through bilateral relations. |
| BLPIO-572 | IO Consultation Event - Ladywood | | 09/01/23 09:52 | Provide free busses in a 3 mile radius from City Centre to take most traffic off the roads | The Council does not control bus fares, however we will work with partners and public transport operators to establish and manage the link between parking costs and public transport fares. Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone. We are supporting TfWM in their efforts to enhance local public transport services. We will continue to invest in public transport priority through road space reallocation. |
| BLPIO-591 | Councillor Julien Pritchard | Green Party Group | 09/01/23 17:08 | <ul style="list-style-type: none"> Public transport routes to be the spatial skeleton of new developments, which | These issue are being addressed in the Birmingham Transport Plan Delivery Plan which is also informing the development of the BLP Connectivity Policies. |

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| | | | | is beneficial for housing densification. | |
| BLPIO-5 | Mr Grant Bright | | 31/10/22 21:32 | Free public transport | The Council does not control bus fares, however we will work with partners and public transport operators to establish and manage the link between parking costs and public transport fares. Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone. |
| BLPIO-125 | Mr Robert Adey | | 04/12/22 21:17 | Strengthen inter-city public transport. | The Birmingham Transport Plan 2031 outlines how the city’s transport system needs to be transformed to meet the challenges of the next decade. The Birmingham Local Plan recognises the value of good connectivity within and beyond the city boundary. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes which extend beyond the local authority boundary. More details on the bus proposals are included in TfWM’s Strategic Vision for Bus. Further work is planned on the Midland Metro and new rail stations are being developed. We are supporting Transport for West Midlands in their efforts to enhance local public transport services. We will continue to invest in public |

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| | | | | | transport priority through road space reallocation. |
| BLPIO-137 | Mr David Carter | Tyler Parkes | 05/12/22 09:52 | Increase frequency and operation time. | We would like to take a proactive approach to enabling and managing the evening and night-time economy, including support for the provision of public transport, and in particular evening services. There is good bus coverage in Birmingham, but journey times can be unpredictable and provision unequal across the city and at different times of the day. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes. The West Midlands Enhanced Partnership Scheme for Buses (2022), committed local bus operators, the West Midlands local authorities and Transport for West Midlands to work together to support improvements to bus services, with passengers benefitting from attractive and convenient bus services. |
| BLPIO-169 | Miss Helen Davies | Transport for West Midlands | 05/12/22 13:13 | See our response to question 48 as includes elements of improving public transport. | Comment noted. |
| BLPIO-173 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:50 | <ul style="list-style-type: none"> • Bus prioritisation network • co-operate with bus operators so that the network align with the | We are pleased to see that your comments align with the principles that guide our work. Prioritising sustainable transport and reducing the need to travel is a key element |

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| | | | | <p>council's strategic objective.</p> <ul style="list-style-type: none"> • Park-and-ride schemes in appropriate areas | <p>of the Birmingham Transport Plan and the emerging Birmingham Local Plan will fully support this through land use policies that aim to increase density, support mixed land uses and restrict car availability and use. The Birmingham Local Plan will also promote and prioritise sites with high levels of accessibility by sustainable modes, including Park and Ride schemes where appropriate and where it meets our objectives. We are supporting Transport for West Midlands in their efforts to enhance local public transport services. We will continue to invest in public transport priority through road space reallocation.</p> |
| <p>BLPIO-202</p> | <p>IO Consultation Event - Sutton Cold</p> | | <p>06/12/22 10:21</p> | <ul style="list-style-type: none"> • Expansion of the tram network needed. • Improve the frequency and connectivity of public transport. • Improve safety at bus stops. | <p>Agree that public transport provision needs to be strengthened. There is good bus coverage in Birmingham, but journey times can be unpredictable and provision unequal across the city and at different times of the day. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes. More details on the bus proposals are included in TfWM's Strategic Vision for Bus. Further work is planned on the Midland Metro and new rail stations are being developed. We will work closely with our partners to improve safety at bus stops and other public transport hubs.</p> |

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| BLPIO-244 | Mrs Michaela Moore | Hammerson - Bullring and Grand Central | 13/12/22 13:18 | Reducing car use and dominance does not equal eliminating private car uses entirely, the long term transition to EVs and car sharing will still require car parking. Public transport might be unreliable and have low accessibility for disabled people. | We have noted your comments. Managing demand for parking is a central means of managing demand for travel by car. Repurposing of car parking will be carefully considered taking account of parking availability, cost and who parking is available to. The City's Parking SPD addresses electric vehicle charging and the City Council are currently rolling out a network of publicly accessible charge points across the city. |
| BLPIO-534 | | MEPC Limited | 04/01/23 16:56 | Additional infrastructure should be delivered through partnership working and with clear funding identified. | Comment welcomed and noted. |
| BLPIO-550 | Mr Antony Whitehead | Our Town | 05/01/23 15:57 | New bus station in Sutton Coldfield which should be easily accessible and provide a positive arrival experience. | Your comments on approaches to improve public transport and travel experience are noted. |
| BLPIO-558 | IO Consultation Event - Erdington | | 06/01/23 16:57 | Erdington Train station needs improving Buses need to be more frequent and disabled-friendly. | The Birmingham Transport Plan 2031 outlines how the city's transport system needs to be transformed to meet the challenges of the next decade. The Birmingham Local Plan recognises the value of good connectivity within and beyond the city boundary. Agree that public transport provision needs to be strengthened as provision can be unequal |

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| | | | | | <p>across the city and at different times of the day. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes which extend beyond the local authority boundary. More details on the bus proposals are included in TfWM's Strategic Vision for Bus, which includes inclusive travel for all. Further work is planned on the Midland Metro and new rail stations are being developed.</p> |
| <p>BLPIO-18</p> | <p>Janelle Kolas</p> | | <p>04/11/22 09:54</p> | <p>More trains. The current plans to expand the railways ignores Bartley Green and California.</p> | <p>The Birmingham Transport Plan 2031 outlines how the city's transport system needs to be transformed to meet the challenges of the next decade. The Birmingham Local Plan recognises the value of good connectivity within and beyond the city boundary. Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone. Further work is planned on the Midland Metro and new rail stations are being developed.</p> |
| <p>BLPIO-79</p> | <p>Mr Nick Reed</p> | <p>West Midlands Music Board</p> | <p>29/11/22 15:45</p> | <p>- free or subsidised public transport</p> | <p>The Council would like to take a proactive approach to enabling and managing the evening and night[1]time economy. This could include considering whether to have a policy that seeks to protect public houses,</p> |

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| | | | | | <p>theatres, live music venues and night clubs from change of use. The Council are also considering whether to have a policy which encourages the clustering of night-time economy uses. This could support the provision of public transport, in particular evening services and timetables. The Council does not control bus fares, however we will work with partners and public transport operators to establish and manage the link between parking costs and public transport fares. Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone.</p> |
| <p>BLPIO-102</p> | <p>The Tyler Parkes Partnership Ltd Gail Collins</p> | <p>West Midlands Police</p> | <p>02/12/22 19:00</p> | <p>To ensure that there is connectivity at transport hubs so passengers can transfer from one mode to another without having to walk through areas where there is crime or where they will experience fear of crime</p> | <p>Active travel and public transport facilities are a key priority for Birmingham's Transport Plan and are essential to delivering a sustainable well-connected city. The Council have outlined how the city's transport system needs to be transformed to meet the challenges of the next decade. The Council recognise that fear of crime and crime is a concern for public transport users. The West Midlands Enhanced Partnership Scheme for Buses (2022), committed local bus operators, the West Midlands local authorities and TfWM to work together to support</p> |

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| | | | | | <p>improvements to bus services, with passengers benefitting from attractive and convenient bus services. Objectives include ‘Evolve a network to support a 24/7 thriving economy, connecting people to new and developing destinations and attractions’ and also ‘Creating a safe, secure and accessible mode for all’. As a way of prioritising sustainable travel in local neighbourhoods, the Council will improve wayfinding, and ensure connectivity with public transport.</p> |
| <p>BLPIO-199</p> | <p>Ms Libby Harris</p> | <p>Birmingham Friends of the Earth</p> | <p>05/12/22 17:19</p> | <ul style="list-style-type: none"> • Bus re-regulation • New developments to be around public transport routes • Provision of covered bus shelters that provide real time information | <p>The decision to use existing powers to bring bus services under local control lies with the West Midlands Combined Authority. We acknowledge the potential benefits of a franchised model and we will support any decision that speeds up the delivery of the Birmingham Transport Plan.</p> <p>The Council are also considering whether to have a policy which encourages the clustering of night-time economy uses. This could support the provision of public transport, in particular evening services and timetables. We will continue to work with Transport for West Midlands (TfWM) as they work with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone.</p> |

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| BLPIO-214 | IO Consultation Event - Yardley | | 08/12/22 10:56 | <ul style="list-style-type: none"> • Frequency and safety of bus services to be improved. • Roads need maintenance • Improve metro service quality. • Improve connectivity of public transport for older people. | <p>The Birmingham Transport Plan 2031 outlines how the city’s transport system needs to be transformed to meet the challenges of the next decade. The Birmingham Local Plan recognises the value of good connectivity within and beyond the city boundary. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes which extend beyond the local authority boundary. Agree that public transport provision needs to be strengthened, especially for older and more vulnerable citizens. There is good bus coverage in Birmingham, but journey times can be unpredictable and provision unequal across the city and at different times of the day. More details on the bus proposals are included in TfWM’s Strategic Vision for Bus. Further work is planned on the Midland Metro and new rail stations are being developed.</p> |
| BLPIO-222 | Chris Lowe | Push Bikes | 12/12/22 18:23 | <ul style="list-style-type: none"> • Adopt a network approach to cycle infrastructure • Exclude canal towpaths as solution for cycling | Active travel facilities are a key priority for Birmingham’s Transport Plan and are essential to delivering a sustainable well-connected city. The Council will continue to develop cycle schemes and improvements |

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| | | | | <ul style="list-style-type: none"> • Section 8.10: Need reference for active travel routes as well • Ensure existing cycle network is accessible for cargo bikes. | <p>including new cycle routes along main commuter corridors, cycle parking, cycle hire schemes and mobility hubs. New development will support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycling security.</p> <p>We note your suggestions for Section 8.10 and to exclude canal towpaths as a solution for cycling.</p> <p>All proposed interventions will require a full Equality Impact Assessment that will assess the effect of each scheme and identify measures to mitigate any adverse impacts, such as barriers on cycle routes preventing e-cargo bikes using them. The Council carried out an e-cargo pilot and received feedback from project partners regarding current issues with e-cargo bike use that have also been noted.</p> |
| BLPIO-278 | IO Consultation Event - Moseley | | 13/12/22 16:19 | <ul style="list-style-type: none"> • Allow children to travel for free on public transport. • Consult people on how and where they want to travel. | <p>The Council does not control bus fares, however we will work with partners and public transport operators to establish and manage the link between parking costs and public transport fares. Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible</p> |

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| | | | | <ul style="list-style-type: none"> Needs more partnership working, e.g. with TfWM. | for everyone. We are supporting Transport for West Midlands in their efforts to enhance local public transport services. We will continue to invest in public transport priority through road space reallocation. |
| BLPIO-397 | Mr Richard Forbes | Canal and Rivers Trust (Planning Manager) | 28/12/22 13:43 | Expand and explore the current canal water bus provision within the city. | Comments are noted and we welcome the suggestion to explore and enhance the current canal water bus provision within the city. |
| BLPIO-543 | Mr David Joseph | Bloor Homes | 05/01/23 11:30 | No comment. | |
| BLPIO-580 | IO Consultation Event - Stirchley | | 09/01/23 12:36 | <ul style="list-style-type: none"> More trams and better park-and-ride facilities. increase frequency and extend operation time of trains More stringent CAZ measures. | Transport for West Midlands (TfWM) works with bus and train operators to make sure that public transport is: safe, reliable, affordable and accessible for everyone. We are supporting TfWM in their efforts to enhance local public transport services. We will continue to invest in public transport priority through road space reallocation. Further work is planned on the Midland Metro and new rail stations are being developed. The Council are considering whether to have a policy which encourages the clustering of night-time economy uses. This could support the provision of public transport, in particular evening |

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| | | | | | services and timetables. We are continuing to develop CAZ measures and your comments are noted. |
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Question 50 - Should new development be required make provision for future proof digital infrastructure?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
|----------------------------------|-----------------------------------|---|-------------------|--|--|
| <u>BLPIO-28</u> | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No specific comments | Noted |
| <u>BLPIO-167</u> | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:08 | Yes | Noted |
| <u>BLPIO-275</u> | Unknown | Westside Business Improvement District | 13/12/22 16:13 | Take the reduce in need to travel into account during policy making. Also bear in mind the cost implications for developers. | Reducing the need to travel is a key element of the Birmingham Transport Plan and the emerging Birmingham Local Plan will fully support this through land use policies that aim to increase density, support mixed land uses and restrict car availability and use. The Birmingham Local Plan will also promote and prioritise sites with high levels of accessibility by sustainable modes. |
| <u>BLPIO-591</u> | Councillor Julien Pritchard | Green Party Group | 09/01/23 17:08 | We would support this particularly as digital poverty is still such an issue in so much of the city. | Comment is noted. |

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| BLPIO-12 | Mr Lewis Lucas | | 04/11/22 08:48 | Yes | Noted |
| BLPIO-51 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:28 | Yes | Noted |
| BLPIO-116 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:37 | Yes | Noted |
| BLPIO-199 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 17:19 | Support new development being required to make provision for future proof digital infrastructure. | Comments are noted and support is welcomed. |
| BLPIO-397 | Mr Richard Forbes | Canal and Rivers Trust (Planning Manager) | 28/12/22 13:43 | Infrastructure providers/developers can utilise the canal towpath network by burying their service cables under the towpath. | Comments are noted and welcome the practical infrastructure comments. |
| BLPIO-543 | Mr David Joseph | Bloor Homes | 05/01/23 11:30 | Supports the provision of future proofed digital infrastructure. | Comments are noted and support is welcomed. |
| BLPIO-5 | Mr Grant Bright | | 31/10/22 21:32 | Yes | Noted |

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| BLPIO-137 | Mr David Carter | Tyler Parkes | 05/12/22 09:52 | Yes, although the requirements need to be defined. | Noted |
| BLPIO-169 | Miss Helen Davies | Transport for West Midlands | 05/12/22 13:13 | <ol style="list-style-type: none"> 1. Consider micro-mobility in the plan 2. Use technology and transport information to support micromobility, ZEVs and CAV (5G networks needed) | <ol style="list-style-type: none"> 1. These issue are being addressed in the Birmingham Transport Plan Delivery Plan which is also informing the development of the Birmingham Local Plan Connectivity Policies and the LTP Area Strategy for Birmingham. 2. Active travel facilities are a key priority for Birmingham’s Transport Plan and are essential to delivering a sustainable well-connected city. The Council will continue to develop cycle schemes and active travel improvements including secure and well connected mobility hubs. These issue are being addressed in the Birmingham Transport Plan Delivery Plan which is also informing the development of the BLP Connectivity Policies LTP Area Strategy for Birmingham. |
| BLPIO-173 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:50 | Yes | Noted |

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| BLPIO-550 | Mr Antony Whitehead | Our Town | 05/01/23 15:57 | See digital infrastructure as part of overall connectivity. | Comments are noted. |
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Question 51 - Should all developments be required to meet an accredited standard for digital connectivity?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
|---------------------------|--------------------|-------------------------------|-------------------|---|--|
| BLPIO-12 | Mr Lewis Lucas | | 04/11/22 08:48 | No | Noted |
| BLPIO-51 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:28 | Yes | Noted |
| BLPIO-116 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:37 | Yes | <i>Noted</i> |
| BLPIO-489 | Ross Franklin | Birmingham Airport Limited | 03/01/23 12:03 | Where 5G installations are proposed within 7KM of Birmingham Airport we would need to receive assurance from proposed developments that any infrastructure will operate outside of the conflicting bands. | Comments are noted. The draft policy will be subject to further consultation and any new infrastructure will be subject to consultation in accordance with the legal requirements. |
| BLPIO-28 | Mr Joshua James | Severn Trent Water | 09/11/22 14:43 | No specific comments | Noted |

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| BLPIO-167 | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:08 | Yes | Noted |
| BLPIO-275 | Unknown | Westside Business Improvement District | 13/12/22 16:13 | Market should decide. | Comments noted. |
| BLPIO-591 | Councillor Julien Pritchard | Green Party Group | 09/01/23 17:08 | Again, we would support this as a key part of tackling the digital divide. | Comments noted |
| BLPIO-199 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 17:19 | Support developments to be required to meet an accredited standard for digital connectivity. | Comments are noted and support is welcomed. |
| BLPIO-543 | Mr David Joseph | Bloor Homes | 05/01/23 11:30 | No comment. | Noted |
| BLPIO-5 | Mr Grant Bright | | 31/10/22 21:32 | Yes | Noted |
| BLPIO-137 | Mr David Carter | Tyler Parkes | 05/12/22 09:52 | Given Birmingham's fibre network this would seem sensible. | Comments are noted and support is welcomed. |

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| BLPIO-173 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:50 | Yes | Noted |
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Question 52 - Do you agree with the principles for identifying opportunity areas?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
|---------------------------|----------------------|------------------------|----------------|---|--|
| BLPIO-65 | Mr Andrew Lightstone | DP9 Ltd | 25/11/22 17:53 | Yes, agree with the principles. | Support noted. |
| BLPIO-122 | Mr Robert Adey | | 04/12/22 21:09 | Those coming into the city for work need convenient ways to travel. | The Birmingham Transport Plan 2031 outlines how the city’s transport system needs to be transformed to meet the challenges of the next decade. The Birmingham Local Plan recognises the value of good connectivity within and beyond the city boundary. Several bus investment programmes are underway including Sprint rapid transit buses and cross-city bus routes which extend beyond the local authority boundary. More details on the bus proposals are included in TfWM’s Strategic Vision for Bus. Further work is planned on the Midland Metro and new rail stations are being developed. |
| BLPIO-138 | Mr David Carter | Tyler Parkes | 05/12/22 09:56 | Yes, agree with the principles. | Support noted. |

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| BLPIO-174 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:51 | Not relevant to Moseley | Noted |
| BLPIO-230 | IO Consultation Event - Harborne | | 13/12/22 11:58 | Agree with the principles and welcome economic and population growth in the city. | Support noted. |
| BLPIO-296 | | Henley Investment Management Ltd | 14/12/22 12:05 | There needs to be a focus on Curzon Enterprise Zone and the HS2 station as this will bring wider benefits to the City Centre. To harness the opportunities requires constructive engagement with landowners. | Noted. Further commentary will be included on the Curzon Enterprise Zone. |
| BLPIO-463 | Emily Barker | Worcestershire County Council | 30/12/22 13:16 | <ol style="list-style-type: none"> 1. The Plan must make adequate provision for minerals and waste and address any cross boundary matters in relation to these. Ongoing dialogue regarding these matters would be welcomed. 2. Need to also consider cross-boundary impacts of growth on other | The Plan will provide policies on waste and minerals in line with national guidance. The Council recognises the need for Birmingham to work co-operatively with other local authorities and bodies in the wider area to deal with such issues where they cut across local authority boundaries. |

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| | | | | infrastructure within Worcestershire, including education infrastructure. | |
| BLPIO-523 | | Druids Heath Consortium | 04/01/23 11:43 | Broadly agree but shouldn't rely on existing strategies where they have previously failed to deliver growth. | Comments noted. |
| BLPIO-535 | | MEPC Limited | 04/01/23 16:58 | Supportive of the principles, in particular where there are existing or emerging masterplans and frameworks. New opportunities should be identified beyond previous allocations where they have not been developed. | Support noted. |
| BLPIO-29 | Mr Joshua James | Severn Trent Water | 09/11/22 14:47 | Keep Severn Trent up to date as the plan progresses. | Consultees will be kept up to date on plan progress. |
| BLPIO-152 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 11:00 | Embed biodiversity and green infrastructure in to the design principles for the opportunity areas. This should include ambitious targets for biodiversity to be delivered in SPDs and the wider strategic targets of the new plan. | Opportunity area policies will address any area specific biodiversity and green infrastructure requirements. |

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| BLPIO-168 | Mrs Fiona Adams | The Moseley Society | 05/12/22 13:09 | Yes, but ensure that other areas of the city are not neglected in terms of CIL and s106. | Planning obligations will continue to be sought on relevant developments in line with the Regulations. This will be assessed on a case by case basis through the planning application process. |
| BLPIO-180 | Mr Matthew Williams | Volume Property | 05/12/22 15:07 | Agree, but also prepare a mixed use masterplan SPD for the Gun Quarter. | Noted. |
| BLPIO-276 | Unknown | Westside Business Improvement District | 13/12/22 16:15 | Yes, agree with the principles. | Support noted. |
| BLPIO-391 | Carl Mellor | Dudley Metropolitan Borough Council | 21/12/22 16:26 | In accordance with the options for identifying further housing land supply, review assumptions in the opportunity areas to seek to increase capacity and maximise the effective use of land within the city. | Comments noted. |
| BLPIO-477 | | Midlands Land Portfolio Ltd | 30/12/22 15:34 | Support the continuation of existing growth areas as well as the identification of new growth areas, but Green Belt development sites should also be considered as new growth areas. The identification of these should | Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document |

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| | | | | be informed by a Green Belt review. | |
| BLPIO-493 | | University of Birmingham | 03/01/23 13:47 | <ol style="list-style-type: none"> 1. It's not clear if the principles for identifying opportunity areas are exclusive to each other or if they all need to apply. 2. Support focus on urban areas and sustainable locations but there should be flexibility if further opportunity areas can deliver wider improvements. 3. Clearer definition required of what is meant by clustering of development opportunities. Clustering may be appropriate in some, but not all circumstances. 4. Do not support emerging or adopted masterplans/frameworks if this only includes those prepared by the city | <ol style="list-style-type: none"> 1. The principles are exclusive to each other. 2. The second principle provides such flexibility. 3. Wording will be corrected to clustering of 'opportunity sites for development' to avoid confusion with opportunity areas. 4. Noted 5. In accordance with the NPPF, all reasonable alternatives must be explored before considering altering the Green Belt. The NPPF says that changes to the Green Belt should only be done in exceptional circumstances. The starting point is looking at whether we can maintain the current Green Belt and still build the homes needed. |

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| | | | | <p>council and not those prepared by developers.</p> <p>5. An additional principle of focusing development on the edge of the urban area is suggested.</p> | |
| BLPIO-517 | | Midland Land Ltd | 04/01/23 10:58 | Broadly agree but shouldn't rely on existing strategies where they have previously failed to deliver growth. | Comments noted. |
| BLPIO-592 | Councillor Julien Pritchard | Green Party Group | 09/01/23 17:13 | <p>1. Ok in principle but opportunity areas should also be underpinned the concept of by nodes, corridors and proximity to public transport.</p> <p>2. There is also the opportunity to retrospectively densify existing opportunity areas where recent development has been unsustainable</p> | <p>1. Comments noted. As indicated in the Issues and Options Document, the selection of growth/ opportunity areas will be guided by the principle of locations which are (or will be) well served by public transport, cycling and walking infrastructure and other services and amenities.</p> <p>2. In line with national policy, the Local Plan will seek to optimise densities on housing sites to make better use of land in line with national policy while ensuring that high quality living environments are created and the full range of identified housing needs are met.</p> |

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| BLPIO-127 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 21:23 | Yes, agree with the principles. | Support noted. |
| BLPIO-200 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 17:25 | Oppose the loss of Green Belt. Instead the focus should be on brownfield development and bringing vacant buildings back in to use, firstly within Birmingham and then in neighbouring authorities. | Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-246 | Mrs Michaela Moore | Hammerson - Bullring and Grand Central | 13/12/22 13:27 | Agree with the principles and requirements such as land use, scale of growth and housing density. | Support noted. |
| BLPIO-364 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:23 | Yes, agree with the principles. | Support noted. |

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| BLPIO-372 | Rosamund Worrall Unknown | Historic England | 21/12/22 13:11 | Ensure that the historic environment is properly considered in identifying opportunity areas, in line with Historic England's advice note. | Historic England advice will be considered when identifying opportunity areas. |
| BLPIO-524 | | IM Properties | 04/01/23 12:02 | Yes, agree with the principles. | Support noted. |
| BLPIO-544 | Mr David Joseph | Bloor Homes | 05/01/23 11:34 | Broadly agree but shouldn't rely on existing strategies where they have previously failed to deliver growth. | Comment noted. |
| BLPIO-38 | Mr Stuart Morgans | Sport England | 17/11/22 19:20 | Also consider the development of unoccupied and neglected properties. | As stated in paragraph 4.14 of the Issues and Options Document The use of brownfield land is a priority for the government and has been a key part of Birmingham's development strategy for many years. Whilst many large brownfield sites have been redeveloped through the continued regeneration of the city, further opportunities have been identified through work undertaken to search for sites which have not come forward through the traditional Call for Sites process, this includes land in public and private ownership, as well as areas where multiple land parcels will need to be assembled to bring forward deliverable sites. Many of the sites require a change to the existing land |

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| | | | | | <p>use. We have written to all the landowners of the land parcels identified as suitable through our digital land search and where landowners have confirmed availability of their land for development, these have been included in the HELAA as 'other opportunity sites'. Work will continue to identify further sites appropriate for inclusion in the HELAA.</p> <p>The Council's Empty Homes Team has a strong track record of returning long term and problematic empty homes back into use. The Council's current Empty Property Strategy which covers the period 2019-2024 sets an ambitious target of bringing 350 properties per year back into use. Since 2019, 666 empty properties were brought back in to use through the implementation of the strategy.</p> |
| BLPIO-52 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:31 | Yes, agree with the principles for identifying opportunity areas. | Support noted. |
| BLPIO-117 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:39 | Yes, agree with the principles. | Support noted. |
| BLPIO-417 | Calthorpe Estates | | 29/12/22 14:52 | Agree with the principles but consider some terms like 'urban area' require greater definition. | The term urban area is defined as the built up area of the city. In the main, this will be brownfield land but may, in some circumstances include greenfield land such |

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| | | | | <p>Welcome the identification of Edgbaston as an opportunity area.</p> | <p>as poor quality under-used open space. The starting point for identifying opportunity areas will be focused on the existing urban area in order to safeguard the Green Belt.</p> |
| <p>BLPIO-442</p> | <p>Imogen Forster</p> | <p>St Joseph Homes Limited</p> | <p>30/12/22 10:25</p> | <p>Agree with the principles for identifying opportunity areas.</p> | <p>Support noted.</p> |
| <p>BLPIO-458</p> | <p>Unknown</p> | <p>Taylor Wimpey (North Midlands)</p> | <p>30/12/22 12:47</p> | <p>Support the continuation of existing growth areas as well as the identification of new growth areas, but Green Belt development sites should also be considered as new growth areas. The identification of these should be informed by a Green Belt review.</p> | <p>Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document.</p> |
| <p>BLPIO-470</p> | <p>Mr James Chatterton</p> | <p>William Davis Ltd</p> | <p>30/12/22 14:46</p> | <p>Support the continuation of existing growth areas as well as the identification of new growth areas, but Green Belt development sites should also be considered as new growth areas. The identification of these should be informed by a Green Belt review.</p> | <p>Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document.</p> |
| <p>BLPIO-490</p> | | <p>MKF Investments</p> | <p>03/01/23 12:03</p> | <p>Support the principles for identifying opportunity areas and</p> | <p>Support noted.</p> |

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| | | | | have submitted a site to be considered in the plan-making process. | |
| BLPIO-502 | Craig Rowbottom | Arup | 03/01/23 15:01 | Consider the effect that new opportunity areas will have on existing SPDs and masterplans and work with partners to ensure delivery of development in these areas. | Comments noted. |

Question 53 - What are your views on the proposed approach to the opportunity areas?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
|---------------------------|----------------------------------|----------------------------|-------------------|--|---|
| BLPIO-138 | Mr David Carter | Tyler Parkes | 05/12/22 09:56 | Opportunity areas should be meaningful and quantify their capacity for development. They should also be covered by SPDs or even within a DPD, but avoid duplication with capacity identified elsewhere. | Comments noted. |
| BLPIO-174 | Professor Jean Gilkison | Moseley Regeneration Group | 05/12/22 13:51 | None | Noted |
| BLPIO-230 | IO Consultation Event - Harborne | | 13/12/22 11:58 | People prefer to travel away from here as well as from Great Barr. Kingstanding only has one park which isn't welcoming. In the City Centre, nothing is happening yet in Digbeth and the Mailbox is expensive. | The regeneration of Digbeth is underway and the Council will be publishing a non-statutory framework for the Central Birmingham area in May 2023. |
| BLPIO-523 | | Druids Heath Consortium | 04/01/23 11:43 | Broadly agree but only support the principle of SPDs and masterplans where they are prepared prior to the adoption of the Local Plan and not afterwards. | Comments are noted. |

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| BLPIO-535 | | MEPC Limited | 04/01/23 16:58 | Paradise should continue to be identified as supporting the wider city centre as an opportunity area in the new plan. | Comments noted. The city centre will continue to be an important growth/opportunity area. |
| BLPIO-103 | The Tyler Parkes Partnership Ltd Gail Collins | West Midlands Police | 02/12/22 19:02 | <ol style="list-style-type: none"> 1. Support the proposed approach to opportunity areas. 2. There should be a greater emphasis on meeting the SA Objective 2a) (crime and fear of crime). 3. The provision of social and community infrastructure and safety and security should also be considered in each area. 4. Contributions should be sought through CIL/S106 to support these objectives. 5. The police should also be actively engaged as the plan progresses, including the preparation of the IDP, masterplanning and policy implementation. | <ol style="list-style-type: none"> 1. Support noted. 2. The Local Plan will aim to create safe environments which could help reduce the opportunities for crime and reduce the fear of crime. 3. As point 2 above. 4. Noted 5. BCC will continue to engage with the Policy as the plan progresses including the preparation of the IDP, masterplanning and policy implementation. |

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| BLPIO-127 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 21:23 | Opportunity areas should be meaningful. Unclear what might be proposed. List may be too long. | Paragraph 9.6 of the Issues and Options Document set out the key principles for the opportunity areas and the potential policy content for opportunity areas. e.g. e.g. land use, scale of growth (floorspace for commercial/ leisure/industrial/mixed uses, the number homes), housing density and other area specific other requirements. |
| BLPIO-200 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 17:25 | Oppose the loss of Green Belt. Instead the focus should be on brownfield development and bringing vacant buildings back in to use, firstly within Birmingham and then in neighbouring authorities. | Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-372 | Rosamund Worrall Unknown | Historic England | 21/12/22 13:11 | Consider the use of a concept plan and design code/SPD for each opportunity area. | Comment noted. |
| BLPIO-398 | Mr Richard Forbes | Canal and Rivers Trust (Planning Manager) | 28/12/22 13:50 | Growth area policies may need to contain canal specific requirements, which can be confirmed through future consultations. | Agree with principle of canals being considered within policy requirements for opportunity areas. |

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| BLPIO-524 | | IM Properties | 04/01/23 12:02 | Support the identification of Peddimore as an existing opportunity area, and distinguished from new opportunity areas. | Support noted. |
| BLPIO-544 | Mr David Joseph | Bloor Homes | 05/01/23 11:34 | Broadly agree but only support the principle of SPDs and masterplans where they are prepared prior to the adoption of the Local Plan and not afterwards. | Comment noted. |
| BLPIO-29 | Mr Joshua James | Severn Trent Water | 09/11/22 14:47 | No specific comments, but keep Severn Trent up to date as the plan progresses. | Consultees will be kept up to date on plan progress. |
| BLPIO-180 | Mr Matthew Williams | Volume Property | 05/12/22 15:07 | Prepare a mixed use masterplan SPD for the Gun Quarter. | Noted. |
| BLPIO-276 | Unknown | Westside Business Improvement District | 13/12/22 16:15 | Support the proposed approach, particularly in regard to the City Centre. | Support noted. |
| BLPIO-338 | National Grid | | 20/12/22 15:50 | Development pressures mean that land is brought forward sometimes containing National Grid infrastructure. Suggests that any relevant development policy | Comments are welcomed. Existing National Grid infrastructure will be taken into account when identifying sites and opportunity areas. |

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| | | | | should include policy strand to ensure in situ utilities are considered in development proposals. Asset map has been supplied. | |
| BLPIO-391 | Carl Mellor | Dudley Metropolitan Borough Council | 21/12/22 16:26 | A Green Belt Review is also required to maximise development opportunities within the city. | Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-477 | | Midlands Land Portfolio Ltd | 30/12/22 15:34 | Agree with the proposed approach. Suggest that developer consortiums take the lead on preparing masterplan SPDs where they are working together on the delivery of larger sites. | The Council will work with relevant developers and landowners in the preparation of any masterplan frameworks or area-specific SPD. |
| BLPIO-493 | | University of Birmingham | 03/01/23 13:47 | <ol style="list-style-type: none"> 1. Unclear if opportunity areas will be designated along with site allocations of if only opportunity areas will be identified. 2. Opportunity areas should not be limited to those already identified in the BDP and all areas of the | <ol style="list-style-type: none"> 1. Site allocations and opportunity areas will be identified. 2. The opportunity areas will not be limited to those already contained in the BDP. In accordance with the NPPF, all reasonable alternatives must be explored before considering altering the Green Belt. The NPPF says that changes to the Green Belt should only |

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| | | | | <p>city needs to be looked at as a starting point. Green Belt land should not be excluded from the 'first sieve'.</p> <p>3. Areas outside designated opportunity areas must not be precluded from development.</p> | <p>be done in exceptional circumstances. The starting point is looking at whether we can maintain the current Green Belt and still build the homes needed.</p> <p>3. Agree.</p> |
| BLPIO-517 | | Midland Land Ltd | 04/01/23 10:58 | Broadly agree but only support the principle of SPDs and masterplans where they are prepared prior to the adoption of the Local Plan and not afterwards. | The Council will work with relevant developers and landowners in the preparation of any masterplan frameworks or area-specific SPD. |
| BLPIO-52 | Mr Mike Mounfield | Colmore BID | 21/11/22 16:31 | Consider 15 minute neighbourhoods. | Liveable neighbourhoods/ healthy living zones can help to reduce travel times and increase access for residents to day-to day services and facilities. It will be considered how the concept will applied in the Local Plan. |
| BLPIO-417 | Calthorpe Estates | | 29/12/22 14:52 | Allow SPDs and masterplans to be prepared by landowners and developers to speed up the implementation of the opportunity areas. | The Council will work with landowners and developers in preparing any masterplans and area-specific SPDs. |

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| BLPIO-442 | Imogen Forster | St Joseph Homes Limited | 30/12/22 10:25 | Support the continuation of growth areas from the BDP along with new growth areas linked to SPDs and masterplans. Requirements in each growth area should be tailored so that they are not too onerous and can support the delivery of development, and should be supported by infrastructure improvements. | Support noted. |
| BLPIO-458 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:47 | Agree with the proposed approach. Suggest that developer consortiums take the lead on preparing masterplan SPDs where they are working together on the delivery of larger sites. | The Council will work with relevant developers and landowners in the preparation of any masterplan frameworks or area-specific SPD. |
| BLPIO-470 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:46 | Agree with the proposed approach. Suggest that developer consortiums take the lead on preparing masterplan SPDs where they are working together on the delivery of larger sites. | The Council will work with relevant developers and landowners in the preparation of any masterplan frameworks or area-specific SPD. |
| BLPIO-502 | Craig Rowbottom | Arup | 03/01/23 15:01 | Agree and welcome the identification of Perry Barr as an opportunity area. | Comments noted. |

Question 54 - Have we identified the correct opportunity areas?

| ID | Full Name | Company / Organisation | Created On | BCC Summary | BCC Officer Response |
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| BLPIO-65 | Mr Andrew Lightstone | DP9 Ltd | 25/11/22 17:53 | <ol style="list-style-type: none"> 1. The designation of Opportunity Areas is welcomed insofar as focussing on specific areas for growth. 2. The City Centre is too large for a single opportunity area and should be broken up in to smaller opportunity areas. In particular the former Smithfield site should be an opportunity area and should reflect the planning application for this development site. | Comment relating to smaller city centre opportunity areas will be carefully considered. |
| BLPIO-138 | Mr David Carter | Tyler Parkes | 05/12/22 09:56 | We would like to see a new S.U.E. added at Fox Hill, in line with the joint proposal submitted in response to this consultation. | Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-174 | Professor Jean | Moseley Regeneration Group | 05/12/22 13:51 | No views. | Noted |

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| | Gilkison | | | | |
| BLPIO-218 | IO Consultation Event - Yardley | | 08/12/22 11:36 | Investment and progress in the City Centre is welcomed. | Comment noted. |
| BLPIO-286 | Mr Ed Barrett | Catesby Estates | 13/12/22 22:36 | Disagree with the HELAA assessment of the Land South of Kempson Avenue (CFS ref 1b4210) as the TPO and PSI designations are not constraints to development. | The Land South of Kempson Avenue was assessed in the 2022 HELAA as currently unsuitable as it falls within the Green Belt. |
| BLPIO-427 | Jane Field | Environment Agency | 29/12/22 15:41 | The River Rea catchment should be identified as an opportunity area, in accordance with the EA's visioning document. In particular the renaturalisation of this area and its potential to reduce flood risk should be recognised in the new plan. | Comments welcomed. Rea Valley Urban Quarter will be included in the Plan. |
| BLPIO-523 | | Druids Heath Consortium | 04/01/23 11:43 | Existing opportunity areas have been identified without supporting evidence. Land adjacent to the urban area also presents an opportunity to deliver development. | Comments are noted. Any further evidence submitted will be considered through the Plan Review. |

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| BLPIO-559 | IO Consultation Event - Erdington | | 06/01/23 17:01 | Too much focus on City Centre and not on areas like Erdington. | Comments are noted and will be further considered through the Growth Zones policies. |
| BLPIO-117 | Mr Matthew Vaughan | The Birmingham Civic Society | 04/12/22 11:39 | Could also consider public transport corridors and apply CIL to these. District centres should also include more residential uses. | The suggested areas will be considered. |
| BLPIO-145 | Mr John Pearce | Bloor Homes | 05/12/22 10:11 | Land around Bartley Reservoir should also be identified as an opportunity area. Could accommodate around 3000 dwellings of which approx 500 would fall within the BCC boundary. | Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-208 | IO Consultation Event - Northfield | | 07/12/22 14:18 | Great Park in Rubery is under-used - especially around the bingo hall and bowling alley car park. | There is a current planning application (2022/06330/PA) at Great Park Rubery for construction of 4 no. restaurant units (Use Class E[b]) to front of existing cinema building and construction of 2 no. drive-thru restaurant units (Sui Generis) within the site boundary along with associated works. |
| BLPIO-417 | Calthorpe Estates | | 29/12/22 14:52 | 1. Question the value of including opportunity areas that are substantially complete. It | 1. Comment noted. 2. Call for Site submissions will be assessed in the context of the |

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| | | | | <p>would be helpful to clarify what additional contribution they are anticipated to make during the Plan period.</p> <p>2. Include the Calthorpe sites as allocations in the new plan and consider the wider benefits that these can bring to housing mix and the provision of affordable housing.</p> | <p>emerging development strategy of the Local Plan.</p> |
| BLPIO-442 | Imogen Forster | St Joseph Homes Limited | 30/12/22 10:25 | Support the growth areas identified. | Support noted. |
| BLPIO-458 | Unknown | Taylor Wimpey (North Midlands) | 30/12/22 12:47 | Land at Withy Hill and Langley Mill should be identified as an opportunity area. RPS will provide a vision document for this area at future consultation stages. | Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-470 | Mr James Chatterton | William Davis Ltd | 30/12/22 14:46 | Land at Withy Hill and Langley Mill should be identified as an opportunity area. RPS will provide a vision document for this area at future consultation stages. | Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |

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| <p>BLPIO-502</p> | <p>Craig Rowbottom</p> | <p>Arup</p> | <p>03/01/23 15:01</p> | <ol style="list-style-type: none"> 1. Consider also identifying East Birmingham, particularly in regard to the changes arising from HS2 and the Midland Metro extension. 2. Suggest continuing with the term growth areas rather than opportunity areas. 3. More details should be presented on the growth areas at the next stage of the Plan, including detailed maps. 4. Support consolidating the two AAPs within the new plan. Consider also identifying East Birmingham, particularly in regard to the changes arising from HS2 and the Midland Metro extension. 5. Also revise the Policies Map and address inconsistencies in the AAPs and BDP. | <p>Comments are welcomed. Further detail on the growth/ opportunity areas will be included at the next stage of the Plan. The policies map will be revised accordingly. The extent of the East Birmingham area will be considered as a growth/ opportunity area.</p> |
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| BLPIO-127 | Mr David Carter | Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site | 04/12/22 21:23 | Bordersley needs to ensure sufficient protection for sport and recreation uses at Wheels Park, or for appropriate relocation of these uses. | Comments are noted |
| BLPIO-200 | Ms Libby Harris | Birmingham Friends of the Earth | 05/12/22 17:25 | Oppose the loss of Green Belt. Instead the focus should be on brownfield development and bringing vacant buildings back in to use, firstly within Birmingham and then in neighbouring authorities. | Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-227 | | Aston Villa Football Club | 13/12/22 11:38 | Aston and Witton should be identified as an opportunity area and will be supported by a masterplan. | Noted and will be further considered through the Growth Zones policies which will relate to specific areas. |
| BLPIO-364 | Alison Ives | Walsall Metropolitan Borough Council | 21/12/22 12:23 | Further opportunity areas might be required to meet as much of the unmet need as possible within the city. | Comment noted. The identification of opportunity areas will be guided by the overall development strategy. |

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| BLPIO-372 | Rosamund Worrall Unknown | Historic England | 21/12/22 13:11 | Difficult to comment as Historic England have only seen areas where draft SPDs have been consulted on. | Further detail in relation to the opportunity areas will be shared as the Local Plan progresses. |
| BLPIO-544 | Mr David Joseph | Bloor Homes | 05/01/23 11:34 | <ol style="list-style-type: none"> 1. Existing opportunity areas have been identified without supporting evidence. 2. Land adjacent to the urban area also presents an opportunity to deliver development. | <ol style="list-style-type: none"> 1. The proposed opportunity areas/ growth zones will be supported by evidence. 2. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |
| BLPIO-581 | IO Consultation Event - Stirchley | | 09/01/23 12:45 | Prioritise local areas over the City Centre. | Birmingham city centre is important to the success of the whole city. However, other key areas will also see significant growth and change. |
| BLPIO-29 | Mr Joshua James | Severn Trent Water | 09/11/22 14:47 | No specific comments, but keep Severn Trent up to date as the plan progresses. | Consultees will be kept up to date on plan progress. |
| BLPIO-152 | Mr Alexander Lane | Wildlife Trust for the Birmingham and Black Country | 05/12/22 11:00 | Suggest they are called Strategic Regeneration Areas. | Comment noted. |

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| BLPIO-180 | Mr Matthew Williams | Volume Property | 05/12/22 15:07 | Yes, agree with the identified opportunity areas. | Support noted. |
| BLPIO-184 | Mr Peter Chambers | David Lock Associates on behalf of Birmingham Property Services | 05/12/22 15:19 | Cross-border locations, such as land at Frankley, should also be seen as opportunity areas. | Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-276 | Unknown | Westside Business Improvement District | 13/12/22 16:15 | Consider development opportunities on land to the north of Broad Street and in the Gas Quarter. | Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-391 | Carl Mellor | Dudley Metropolitan Borough Council | 21/12/22 16:26 | Evidence base should consider cross boundary matters and further discussions between DMBC and BCC are welcomed. | Welcome comments and continued working with DMBC in relation to cross boundary matters. |
| BLPIO-477 | | Midlands Land Portfolio Ltd | 30/12/22 15:34 | Land at Withy Hill and Langley Mill should be identified as an opportunity area. RPS will provide a vision document for this area at future consultation stages. | Call for Site submissions will be assessed in the context of the emerging development strategy of the Local Plan. |
| BLPIO-493 | | University of Birmingham | 03/01/23 13:47 | All opportunities across the city need to be considered as a starting point, including non-urban/edge of urban areas. | The opportunity areas will not be limited to those already contained in the BDP. In accordance with the NPPF, all reasonable alternatives must be explored before |

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| | | | | | considering altering the Green Belt. The starting point is looking at whether we can maintain the current Green Belt and still build the homes needed. |
| BLPIO-517 | | Midland Land Ltd | 04/01/23 10:58 | <ol style="list-style-type: none"> 1. Existing opportunity areas have been identified without supporting evidence. 2. Land adjacent to the urban area also presents an opportunity to deliver development. | <ol style="list-style-type: none"> 1. The opportunity areas/ growth zones will be supported by evidence. 2. Comment noted. The preferred strategy will take forward a combination of Options 1-5. Option 6 - Green Belt release - will not be taken forward. The reasons for this will be set out in the Preferred Options Document. |