Birmingham Local Plan

Consultation Statement

Following Preferred Options Stage
which took place
July / August 2024

Birmingham City Council

OFFICIAL

Contents

1. Introduction and Background
   - 1.1 Background to the Consultation 3
   - 1.2 Key stages in the production of the Birmingham Local Plan 3

2. Consultation on the Issues and Options Document (Oct-Nov 2022)
   - 2.1 Objectives of the Issues and Options Consultation 6
   - 2.2 Methods of Engagement 6
   - 2.3 Consultation Events 7
   - 2.4 Duty to Co-operate 9

3. Analysis of Issues and Options Consultation
   - 3.1 Response Numbers
   - 3.2 Key themes and Responses
   - 3.3 The Call for Sites

4. Conclusions on the Issues and Options consultation

5. Consultation on the Preferred Options Document (Jul-Aug 2022)
   - 5.1 Objectives of the Preferred Options Consultation
   - 5.2 Methods of Engagement
   - 5.3 Consultation Events
   - 5.4 Duty to Co-operate

6. Analysis of Issues and Options Consultation
   - 6.1 Response Numbers
   - 6.2 Key themes and Responses
   - 6.3 The Call for Sites

7. Conclusions on the Issues and Options consultation

Introduction and Background

1.1 Background to the Consultation

The Birmingham Development Plan (BDP) was adopted on 10 January 2017 and provides a spatial vision and development strategy for the city over the plan period 2011-2031. The BDP contains strategic policies and site allocations which are used to shape development and determine planning applications. The BDP forms a key part of Birmingham's Local Plan; a collection of documents that sets the planning framework for the city.

Local planning authorities are required by legislation to review Local Plan documents at least every five years from the date of adoption to ascertain if their policies need updating. There have been a number of changes to national planning policy and guidance since the plans were adopted, relating to a variety of issues such as affordable housing, climate change mitigation and biodiversity enhancement, as well as the introduction of a standard method to calculate local housing need and the Housing Delivery Test. Locally, the City Council declared a climate emergency in June 2019 and has committed to achieving carbon neutral status by 2030 or as soon thereafter as a 'just transition' allows.

Given the scale of changes to national policy and legislation and changes in local circumstances as set out above, it was recommended that a new Local Plan was prepared to replace the BDP. The new Local Plan, to be known as the Birmingham Local Plan, will involve evidence and information gathering and three main consultation stages before the Plan is submitted to the Secretary of State for Levelling Up, Communities and Local Government and subject to an Examination in Public carried out by the Planning Inspectorate. If, through that process, the Plan is found to be sound, the Birmingham Local Plan will then be adopted.

1.2 Key stages in the production of the Birmingham Local Plan

There are two key stages within which the Council can formally consult with local communities, businesses and key stakeholders during the production of the Birmingham Local Plan. These are set out as a statutory requirement of Regulations 18 and 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 is the formulation stage of the Local Plan when the Council can consult as many times as they think is necessary to arrive at a final draft version of the Plan. This final draft Plan is published as part of the Regulation 19 stage when it is subject to one final consultation before it is submitted to the Secretary of State to be examined by the Planning Inspectorate.

For the Birmingham Local Plan, there have been two consultation stages so far as part of Regulation 18 – the Issues and Options consultation (October – November 2022) and the Preferred Options consultation (July – August 2024). In July 2024, there was a change in national government which saw a proposed major revision to the National Planning Policy Framework and the Standard Housing Needs Methodology for local planning authorities which have since been adopted. These changes have significant implications for the Birmingham Local Plan and its evidence base which means that

further revisions are necessary to the Local Plan and its evidence and a further consultation has been considered necessary by the Council resulting in a revised timetable for the Birmingham Local Plan which was approved in January 2025.

The table below sets out the proposed timetable for the key stages of the Birmingham Plan along with the minimum consultation period.

Table 1: Proposed Timetable for the Birmingham Plan

Key Stages	Scheduled Date	Minimum Consultation Period
Evidence gathering / Sustainability Appraisal scoping	June 2021	Ongoing throughout Regulation 18
Issues and Options consultation (Regulation 18)	24 October – 5 December 2022	6 weeks
Preferred Options consultation (Regulation 18)	8 July – 27 August 2024	7 weeks
Further Preferred Options consultation (Regulation 18)	November / December 2025	6 weeks
Publication/Pre-submission consultation (Regulation 19)	June / July 2026	6 weeks
Submission (Regulation 22)	October 2026	N/A
Examination (Regulation 24)	January 2027	Ongoing during Examination period led by Planning Inspectorate
Adoption (Regulation 26)	September 2027	N/A

2 Consultation on the Issues and Options document (October – November 2022)

This Consultation Statement sets out the consultation process and outcomes for the Birmingham Local Plan Issues and Options stage. The Issues and Options Consultation took place between 24th October and 5th December 2022. This Statement will explain the background and approach to the consultation and the level of engagement from stakeholders and members of the public along with a summary of the responses including the key issues raised during the consultation. This includes the Council's response to the issues raised and how they will be addressed during the future stages in the development of the Birmingham Local Plan towards adoption.

The National Planning Policy Framework (NPPF) is clear that early and meaningful engagement and collaboration with residents, organisations and businesses is essential in the preparation of the Local Plan. Once it reaches Submission (Regulation 22) Stage, the Birmingham Local Plan will be examined for "soundness" by an independent planning inspector whose role is to assess whether the plan has been prepared in accordance with legal and procedural requirements as well as the Duty to Cooperate. One of the tests of soundness will be whether it is founded on a robust and credible evidence base and represents the most appropriate strategy when considered against the reasonable alternatives. The responses to the consultation exercises will therefore form part of this evidence base and be used to help inform and influence the contents of the Plan as well as guiding the policy choices where options exist.

Birmingham City Council will need to demonstrate that consultation has taken place throughout the process and that we have actively tried to engage with people who have a stake in the future of the area. The City Council has an adopted Statement of Community Involvement (SCI) (2020) which provides guidance on who we will involve in the production of planning documents and the techniques that might be used. SCI's sets out the minimum levels of involvement that interested people should be entitled to expect, but we would hope to exceed these levels where we are able to do so.
During the issues and Options consultation, views were sought on:

- the planning challenges and opportunities for Birmingham
- the vision and objectives for Birmingham
- options for housing growth and the types of homes required
- how should the Local Plan address the Climate Emergency and climate change
- the natural and built environment
- economy and centres
- connectivity
- locations for growth
- the evidence base being prepared
- cross boundary and strategic issues that will need to be addressed

2.1 Objectives of the Issues and Options Consultation

- Understand the requirements and priorities of Birmingham's citizens on what they want its future to be in terms of housing, jobs, infrastructure and the environment.
- Understand how the City's businesses, developers, investors and landowners see the future of Birmingham and how they can contribute to its planning and development.
- Understand how other key stakeholders see the future of Birmingham and how they can contribute to its planning and development.
- To inform all citizens and stakeholders about what we are doing and the stages we have to go through in plan making and adopting the Birmingham Local Plan.
- To secure the involvement of all citizens, business and other stakeholders now and throughout the process of preparing the Birmingham Local Plan.
- To obtain meaningful input, using a range of consultation tools and techniques, to ensure we have a local plan that best meets the needs of Birmingham.

2.2 Methods of Engagement

The Issues and Options Document: An issues and options report entitled Our Future City Plan: Birmingham Local Plan Issues and Options was produced that aimed to guide interested parties through the issues and ask questions to aid the consultation. This provided the background and detail of the different issues and options needing to be addressed when the Birmingham Local Plan evolves through its next consultation stages. The documented set out nine chapters covering the issues set out in paragraph 1.3 above and was accompanied by 54 questions on the various subjects needing to be addressed.

On-line Consultations Document: An interactive version of the Issues and Options consultation document was available online and was hosted by *Objective*. This allowed for consultees to comment on specific questions as they navigated their way through the different chapters of the document. The software was also able to send automatic notifications to all consultees confirming that their consultation responses had been made. Following the consultation period all consultation representations have been collated and grouped together to allow for easier reviewing by officers. Some respondents chose to provide their response via email and these representations were then manually entered on to the *Objective* system by officers.

Call for Sites : To inform the Local Plan and provide suggested sites for future development, a 'Call for Sites' was undertaken in parallel with the Issues and Options consultation (which has also continued since), inviting landowners, developers and anyone who is aware of suitable sites to submit them for consideration through the plan making process. Submission of sites could be made directly using the online *Objective* system including any plans and other attachments. Some submissions were made via email which were then added to the *Objective* system by Officers. In making a submission, information was required on the following:

- Location and access to site
- Potential use and capacity
- Constraints and assets
- Potential infrastructure requirements

Summary Leaflet: A summary leaflet was produced that provided an overview of the key consultation issues in order to encourage people to get involved in the consultation without requiring them to go through the full Issues and Options paper.

Online news releases: The start of the consultation was highlighted on the City Council's website news pages and a link provided to website page for further information.

Consultation Video: A two-minute consultation video was produced to provide a quick accessible overview of the consultation to help reach a wider audience. A link to the video was provided through the website page, social media and on the City Council's YouTube page.

Social Media: Social media was used as a way to promote the consultation period, consultation events and to raise awareness of the issues that the Local Plan will be looking to address. Regular posts were made on the City Council's Twitter, Facebook and LinkedIn accounts. Approximately two posts per week were made through each medium throughout the consultation period and particularly when consultation event dates were approaching (see below).

Posters: Posters promoting the consultation period and local events were distributed across the City to all libraries and a number of community centres and cultural facilities across the whole City.

Display Boards for Events: Pull up banners were produced and used to promote the consultation and at consultation events. Three display boards were produced explaining the key issues and elements of the Local Plan consultation.

Member Bulletin: A bulletin explaining the purpose of the Issues and Options document and the consultation process was sent to Members prior to the start of the consultation period.

Online Members session: An hour-long online Teams session was held on 18th October 2022, prior to the start of the consultation to explain the purpose of the Issues and Options document and the consultation process. The session began with a presentation by Officers followed by a question-and-answer session.

2.3 Consultation Events

Online consultation events: Three hour-long online Teams sessions were arranged open to everyone and advertised as online consultation events. A link was provided online on the City Council's website and the events were advertised on social media and

on the posters distributed (see above). The session began with a presentation by Officers followed by a question-and-answer session. Relevant comments received were added to the Objective system alongside other comments including from the other Consultation Events (see below). The three events were held on the following dates and times:

Monday 31st October 2022	10am-11am
Wednesday 2nd November 2022	6pm-7pm
Friday 4th November 2022	2pm-3pm

Online consultation event for Business Improvement Districts (BIDs): An online event was also held for representatives of the BIDs across the City. This took place on Friday 18th November 2022 at 11.30am where BID representatives were able to hear a presentation on the Issues and Options Document by officers followed by a question-and-answer session. Comments received were then put into the Objective system where relevant.

Face-to-face consultation events: Throughout the consultation period a number of consultation events were held across the city where people could come along, ask questions and find out more about the review. These events were publicised on the Council's website; on the posters which were distributed to venues across the city; and on the City Council's social media accounts as and when they were upcoming. One event was held in each of the ten Constituencies which make up Birmingham plus one other event held in the City Centre (at the Library of Birmingham) with the Constituencies, venues, dates and times set out below.

Constituency and Venue	Date	Time
Erdington Erdington Co-op Supermarket	Tuesday 25th October 2022	1pm-7pm
Hodge Hill The Shard, Library Shard End	Thursday 27th October 2022	10am-5pm
Perry Barr One Stop Centre, Perry Barr	Tuesday 1st November 2022	1pm-7pm
Northfield The Northfield Centre	Thursday 3rd November 2022	12pm-6pm
Sutton Coldfield Gracechurch Shopping Centre	Saturday 5th November 2022	10am-4pm

Selly Oak Morrisons, Stirchley	Thursday 10th November 2022	1pm-7pm
Yardley Swan Centre, Yardley	Tuesday 15th November 2022	12pm-6pm
Ladywood Ladywood Leisure Centre	Thursday 17th November 2022	1pm-7pm
City Centre Library of Birmingham	Saturday 19th November 2022	11am-5pm
Edgbaston Harborne Pool and Fitness Centre	Tuesday 22nd November 2022	1pm-7pm
Hall Green Moseley Exchange	Thursday 24th November 2022	2pm-7pm

2.4 Duty to Co-operate

The Duty to Co-operate is a requirement of the Localism Act 2011 and is designed to ensure that all bodies involved in planning work together on strategic issues that are greater than local significance. It places a legal duty on LPAs and specified prescribed bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

The Duty to Co-operate is not a duty to agree, however LPAs should make every effort to secure the necessary co-operation on strategic cross boundary matters before they submit their Local Plans for examination. The co-operation should produce effective and deliverable policies on strategic cross boundary matters.

Other public bodies, in addition to LPAs, are subject to the Duty to Co-operate by being prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by the National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013.

The Prescribed Bodies are required to co-operate with LPAs and the other Prescribed Bodies. These Bodies play a key role in delivering local aspirations, and co-operation between them and LPAs is vital to make Local Plans as effective as possible on strategic cross boundary matters. The Bodies should be proportionate in how they do this and tailor the degree of co-operation according to where they can maximise the effectiveness of plans.

Planning officers representing the 14 Councils which make up the Birmingham and Black Country Housing Market Area have met regularly (monthly) over the last four years to discuss the housing shortfall across the whole HMA and determine a strategy to reduce the shortfall. The local authorities which make up the HMA were all contacted specifically before and during the consultation to discuss the potential housing and employment land shortfalls that Birmingham will be predicting for the Local Plan period. A presentation on the Birmingham Local Plan consultation was also made at one of the regular monthly meetings held.

3 Analysis of the Issues and Options Consultation

3.1 Response Numbers

Number of consultation respondents = 115
This was made up from the following:

- 11 Councils (Bromsgrove and Redditch, Cannock Chase, Dudley, Lichfield, Sandwell, Solihull, South Staffs, Stratford, Walsall, Wolverhampton, Worcestershire County) + 1 Parish Council (Hagley)
- 14 Public bodies / Duty to Cooperate partners / utilities e.g. Environment Agency, Historic England, National Highways, Network Rail, Severn Trent, TfWM
- 18 Interest groups / campaign groups / Action groups
- 61 Private sector organisations (landowners, developers)
- 10 Individuals

Formal comments received = 595

Call for Sites = 150

- 99 residential sites
- 17 mixed-use sites
- 23 Industrial / commercial sites
- 11 undetermined uses
- 27 on Green Belt sites
- 123 on previously developed / brownfield sites

Total number of people attending the online consultation events = 77

No. of people making comments during the face-to-face consultation events = 90

3.2 Key Themes and Responses Formal Representations

Chapter 2: Challenges and Opportunities

- 41% of respondents to the question on whether they agreed with the challenges and opportunities identified with a further 50% partly agreeing or suggesting other challenges and opportunities in addition.
- Only 9% of respondents disagreed with the challenges and opportunities identified.
- Prioritise brownfield development over greenfield
- Priority not just on house numbers but the need for more affordable homes and homes for the elderly
- Need to emphasise impact of growth on infrastructure as well as on neighbouring authorities
- Need more emphasis on natural environment and its value in mitigating for climate change and flood risk and opportunities to explore Biodiversity Net Gain
- Continue to work closely with other local authorities
- Closer management of the proliferation of HMOs

- All decisions should be made in light of reducing carbon emissions but also ensure that they are viable and deliverable
- Support for net zero carbon aspirations but needs clear goals and milestones which are achievable
- Need to value historic environment
- Important that Local Plan is not overly pre-determined by non-statutory vision of OFCP
- Requires more emphasis on tackling deprivation and inequality
- Large presence of Universities is an opportunity
- Lack of youth facilities
- More emphasis on benefits and opportunities of HS2
- More local transport link improvements to speed access to City Centre for more citizens

Chapter 3: Vision and Objectives

- 58% of respondents agreed with the proposed vision with a further 36% partly agreeing or suggesting amendments or additions.
- Only 6% of those responding to the question on the Vision, disagreed with it.
- Broad agreement with the vision but:
    - More emphasis on built heritage and social heritage needed
    - Need to include high quality new, affordable and family housing
    - Need to include reduction of crime and fear of crime
    - Need more priority on green spaces and the green economy
    - Viability needs to be taken into account
- The vision needs to be more specific to Birmingham and is deemed by some to be ambitious and potentially unrealistic around net zero carbon
- 56% of respondents to whether the objectives were right agreed. A further 37% who answered this question, partly agreed suggested amendments or additions.
- Only 7% of those who answered this question said that these were not the right objectives
- Investment in existing housing stock, skills and making Birmingham safer will be necessary to achieve objectives
- Co-operation and collaborative working with neighbouring authorities and partners to achieve wider growth
- More emphasis on community safety as well as strategic transport priorities
- Could greater 'social value' be added as an objective
- In terms of the most important objectives, Objective 3: A city of growth for all was considered most highly followed by Objective5: A city of thriving neighbourhoods. Objective 1: A net Zero carbon city and Objective 7: A healthy city were also considered important.

Chapter 4 – Homes and Neighbourhoods

Options for housing growth

- In terms of the housing growth options suggested, Option 1: Increasing housing densities was deemed the most popular amongst those that suggested a

preference. This was followed in second and third by Option 6: release green belt for housing and Option 5: Utilise some employment land for housing. The least popular option was Option 4: Utilise poor under-used open space for housing.

- Regulate student housing and HMOs to free up more family housing
- Housing growth not at expense of other facilities such as sport and physical activity
- Green Belt should be last resort but should be reviewed strategically to alleviate pressure on surrounding local authority areas. Small green belt site releases should be considered rather than one large site
- Need agreement on dealing with any shortfall across the whole HMA area before the plan is adopted
- Housing target is too high, lower targets need to be tested to prevent green belt release
- High density housing growth in inner city and at transport modes
- No building on existing open spaces and nature areas
- Avoid conflicts with neighbouring uses when building housing
- Conflicts between higher densities and green city aspirations and impacts on provision of open space
- Range of housing needed including low and high densities to suit all needs

Homes and Neighbourhoods

- 67% of those that responded to the question on densities suggested that they were appropriate with 33% saying that they were not.
- 54% suggested we could be building to even higher densities with 46% saying that we should not.
- When asked whether we should have a policy with a simple split of affordable rent and affordable home ownership, the majority (77%) suggested that other approaches should be considered instead.
- With regard to housing for older people, 65% of those that responded to this question agreed that we should have a policy requiring a certain perentage of housing for older people on residential developments. There was also support for allocating sites specifically for housing for older people with 73% of those responding agreeing to this suggestion.
- Need to ensure that larger family sized accommodation is promoted in suitable locations and have a policy to prevent its loss across the City
- Need flexible approach to type, size, tenure.
- Need a strategy to deal with homelessness
- Need to consider greenfield development as well as brownfield
- Need stronger policy and clear strategy on self and custom build housing
- Concern about high levels of HMOs and exempt accommodation
- Need lots more affordable and need to challenge viability claims of developers
- Needs tighter definition of affordable housing and higher percentages provided
- More provision for older people and disabled people using different housing models
- No need to set aside a proportion of housing sites for elderly accommodation but a more flexible policy instead

- Greater mix in the City centre
- Need to incorporate more health provision in new developments
- Need more PBSA and specific buy-to-let developments for students to free up family housing. Should be within a specific distance from University and be subject to rent caps
- More energy-efficient homes
- Consider more build-to-rent and co-living as well as self-build and community land trusts
- Release green belt and greenfield to increase viability of affordable housing provision
- Simple split of tenure to avoid complicated and over-prescriptive policy approach
- No affordable requirement should be included on C2 elderly person accommodation
- Need a Lifetime Homes policy for all new development
- Gypsy and traveller accommodation should be integrated into existing neighbourhoods where possible in sustainable locations with good access to range of services
- Some say all developments or those over a certain threshold should be subject to a Health Impact Assessment while others say only for the largest development

Chapter 5 – Climate Change

Net Zero carbon

- All new build should be mandated to have energy efficiency measures including solar panels
- Flexibility to consider viability, affordable homes provision and open space provision
- Net zero requirements cannot wait until the Local Plan is adopted
- Net zero requirements are too fast and extensive and should be done through the Building Regs process and not additional policy
- Stronger policies are required to achieve net zero in time and needs to be an overriding theme of the Local Plan including incentives (finance/tax) to exceed requirements and penalties for non-compliance
- Need to clarify what is meant by net-zero carbon (energy only or all operational energy)
- Requires policy and prioritisation of extensive retro-fitting of existing properties across all ownerships instead of demolition – who will co-ordinate and pay for it
- Siting of turbines and solar panels need careful consideration around Birmingham Airport flight paths
- Higher density development and brownfield development will complement climate change measures
- Embodied energy calculations for new development
- Design considerations need to be set out including orientation, car charging, greening of buildings, local heat networks, waste and recycling facilities, green/blue infrastructure, habitat connectivity and life-cycle carbon assessments
- Development should model for more frequent flooding events

- Setup a local low carbon offset fund for new developments that cannot achieve net zero
- Apply BREEAM to relevant developments
- Policies will need to be clear on the hierarchy of requirements – which have priority when viability is an issue

Waste management

- Decarbonise existing heat networks and incorporate energy usage intensity (EUI) into policy to reduce consumption
- Development should be conditioned to submit waste management proposals
- No new incinerators to burn waste
- Infrastructure Delivery Plan to consider sewerage requirements of new development

Water efficiency standards

- 63% of those responding to the issue of water efficiency agreed that the Local plan should introduce higher water efficiency standards
- New development should demonstrate they are water efficient and incorporate water efficiency measures including rainwater harvesting and grey water usage
- Should be adequately covered by building regulations or requires strong evidence to justify otherwise

Overheating of buildings

- 65% of those responding agreed that the plan should introduce a policy to help prevent the overheating of new buildings
- Should align with Building regulations to focus on design for discharging heat
- More green infrastructure for shade and urban cooling
- Intrinsic component of good design
- Standards should be consistently applied
- Should be covered by Building Regs

Rivers and flood risk

- A high proportion (79%) of those responding agreed that the plan should facilitate the provision of multifunctional benefits for rivers in relation to flood risk, ecology, biodiversity and health and wellbeing.
- 100% of those that responded to the issue of providing a catchment-based approach to flood risk management agreed that the local plan should include a policy on this.
- Providing multi-functional and multi-benefit solutions such as watercourse improvements including management of green infrastructure
- Include canals as part of wider blue infrastructure and use them to help with surface water drainage
- Create 8m+ buffer / corridor along rivers (preferably up to 20m)
- De-culverting of water courses policy should be created to address the risks posed by retaining culverted and canalised watercourses
- Maximise assets and benefits of rivers for biodiversity, wildlife, open spaces for leisure
- Policy is needed to object developments that proposes to build new structures on top of ordinary watercourses or within the byelaw easement.

- Encourage positive orientation of developments along river corridors
- Absorption of surface water through more green roofs and other forms of green interceptors
- More use of SUDS
- Flood risk measures should not be subject to viability assessments

Chapter 6 – The Built and Natural Environment

Green Infrastructure

- More street trees and general tree planting as part of sustainable housing growth and other development
- Build parks along canals and rivers to open them up more
- Partner with BIDs and others to deliver green infrastructure in all our centres including green roofs
- Strengthen flood risk policies to provide and retrofit more high-quality SUDs areas and de-culvert water courses
- Adopt a Local Nature Recovery Strategy
- Ensure blue infrastructure is given weight
- Greening of local centres
- Need a target-based approach

Biodiversity Net Gain (BNG) and Urban Greening Factor

- Opinion was split as to whether we should explore higher than 10% net gain for all major developments. 46% said we should explore a higher percentage whereas 43% said that we shouldn't with the remaining 11% saying that this should only occur if viable.
- There was consensus (85%) that we should identify sites for off-site BNG in the local plan.
- Council should set ambitious targets (up to 50% suggested)
- Requiring 10% minimum goes against paragraph 57 of the NPPF and will reduce viability. Should let developers decide to go above 10% and not be a policy requirement
- Only for sites where biodiversity is negligible
- A flexible approach for the application of BNG should be used to ensure viability.
- >10% if gains are well managed / monitored and allow for off-site provision or provision through a credit system
- >10% will require robust evidence
- Additional sites should be allocated to provide off-site BNG as this may help especially smaller developers or small sites be delivered where onsite BNG is more difficult to be achieved but only as a last resort. However on-site BNG should still be prioritised. Such areas could be grouped together to form parks or habitat banks and tied into the Local Nature Recovery Network and together monitored by a live GIS-based solution.

- 71% of those that responded to the issue, agreed that an Urban Greening Factor should be introduced in the local plan with the remainder disagreeing (20%) or suggesting that it should have regard to the viability of developments (9%).
- An Urban Greening Factor should be introduced. Caveats suggested include:
    - on a site-by-site basis
    - only if justified
    - only if schemes such as older people's housing are exempt,
    - if more investment for maintenance of green infrastructure is provided
    - if a target figure or scoring mechanism is provided
    - combine with BNG requirements
- Some suggested an Urban Greening Factor would be unviable, instead a policy that allows a more local and site-specific approach while still aiming for urban greening is more appropriate.

Open Space

- 71% of those that responded to the issue, agreed with the proposed new open space standards suggested.
- A needs-based approach supported by evidence should be used for playing pitch strategy. Demand can be estimated using Sport England's Playing Pitch Calculator.
- Potentially create multifunctional green spaces for flood mitigation/protection
- Differentiation of open space types is helpful but is less flexible
- Increase protection of allotments and playing pitches
- Difficult to apply to inner-city, high-density sites
- Should be pushing for higher standards
- Improve access by identifying derelict / brownfield sites near built-up areas with good walking routes that could be 're-greened', regenerate canals and river access, 15-minute neighbourhoods, more open spaces/squares within urban areas, more playgrounds, improve cycling access and safety, improve bad open spaces and not build on them, increase investment and have a community-led approach

Design

- Consult the Birmingham Civic Society Planning Committee in policy/scheme making.
- Support habitat link and resident health Prioritise active travel movement Respect local character and heritage assets in the city
- Consider impacts of new developments to existing buildings/communities/businesses.
- A tall buildings policy should or be area specific although some disagree
- Require building for Healthy Life Assessments as part of local validation requirements.
- By using design codes.
- 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.

- Suggestions learnt from the Sutton Coldfield Masterplan include design competitions, local design panels, design workshops, greater focus on Neighbourhood Plans and Community Development Trusts and site-specific development plans.

Historic Environment

- Consult the Birmingham Civic Society Planning Committee in policy/scheme making.
- Support habitat link and resident health Prioritise active travel movement Respect local character and heritage assets in the city
- Consider impacts of new developments to existing buildings/communities/businesses.
- Natural and historic environments can often link together to offer greater potential for enhancement of our places.
- Heritage is key to the emerging BLP and can be intrinsically linked to all the identified opportunities.
- 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.
- Require building for Healthy Life Assessments as part of local validation requirements.
- Ensure that the historic environment is properly considered in identifying opportunity areas, in line with Historic England's advice note.

Chapter 7 – Economy and Centres

Regional Investment Sites

- 82% of those that responded to the issue, agreed to the proposed removal of the Regional Investment Site designation
- A few comments on whether to remove Regional Investment Site designation were received. Most agreed, particularly other local authorities but two responses were against removal due to a pressing economic need for strategic employment sites within the West Midlands.
- One respondent suggested that there is still further capacity for strategic provision in Birmingham at Fox Hill, at least in part.
- Other comments included that there is evidence to suggest that demand for sites to meet strategic industrial and logistic uses is greater than estimated and also that there is a need to prevent the employment offer at Longbridge being diluted.

Employment Land

- General support (67% of those responding to the issue) for refocussing Core Employment Areas for B2 and B8 only, in view of the introduction of Use Class E. However, a few disagreed on the basis that such employment areas need to retain flexibility to accommodate non-industrial uses important to the economy as well as health and social aims e.g. sport, leisure, health uses which cannot be accommodated elsewhere. Quality and accessibility improvements would assist in maintaining employment uses in these areas.

- Several suggestions as to how the employment shortfall should be met including:
    - allocating more strategic sites with Fox Hill being suggested by one respondent for mixed / industrial uses
    - discussions and joint working with neighbouring authorities to deliver wider regional options
    - do not deliver housing on existing employment land
    - better integration of employment and residential areas where compatible, including smaller distribution hubs and industrial operations that are well designed to coexist with residential uses with larger uses away from the city centre
    - use land released from HS2
    - promotion of specific sites (including green belt sites); 53 hectares already identified at the West Midlands Interchange site in South Staffordshire
    - Most agree that more flexibility should be allowed for employment land outside of Core Employment areas but some of these areas still provide a good supply of good quality employment sites
    - Growth of clusters should be encouraged e.g. healthcare med-tech businesses at Pebble Mill as well as using the universities as a focus for research and development industries

Offices and affordable workspace

- In terms of offices, a proposed reduction is accepted but long-term impacts of covid are not yet known and many offices also need refurbishment to meet environmental standards.
- Offices should not be unduly restricted in the City Centre as part of wider approach alongside high quality retail and leisure uses.
- Many respondents agreed that there should be a broader policy approach to cover commercial developments under Use Class E but this must be able to ensure that flexibility of uses within centres should be maintained (e.g. for underused office space) but also to deal with conflict of residential and night-time uses.
- 100% of those who responded to the issue agreed that there should be a policy in the local plan to support affordable workspace. No other objections to delivery of affordable workspace as well as its protection with support for start-up and grow-on spaces, hybrid living and working space, mixing such uses with housing developments in areas like the Jewellery Quarter and as part of build to rent proposals.

Local centres / high streets and night-time economy

- Respondents would like to see more of the following in high streets/centres:
    - more diversity, independents and enterprise in retail
    - sensible transport and parking provision facilitating all modes
    - more variety of things to do other than shopping to encourage visitors
    - review of rent/rates of retail premises to provide more flexibility
    - community safety
    - more pubs, restaurants, cafes
    - more landscaping, street trees, SuDS features, seating areas and event space

    - replace vacant retail with residential, hotels, co-work space, sports facilities, childcare and community/health facilities;
    - more youth facilities
    - empty spaces above shops and upward extensions within centres; entertainment areas along canals
- No particular objections to the protection public houses, theatres, live music events and nightclubs with 93% of those responding agreeing that such a policy should be in place.
- protection of arts and cultural venues as well as sports and social clubs
- protection of public houses by making them assets of community value but must be viable as well
- need to maintain night-time economy businesses and protect from creeping residential uses
- new plan could also include a refresh of listed and locally listed buildings.
- Mixed opinions on whether there should be a policy which says where night-time uses should or shouldn't be located, with 62% of those responding saying there should be such a policy and 38% saying not.
- In particular, those who responded suggested the following:
    - important to maintain city centre vitality and viability as a 24-hour centre with a range of uses dispersed throughout the City
    - more about limiting residential next to night-time venues
    - ensure acoustic protection for residential uses
    - whole of City centre should be considered as a night-time economy area
    - curation by the BIDs
    - protection of night-time uses from noise complaint
    - any policy should consider access, safe parking and surveillance e.g. around hot food takeaway clusters
    - more wardens
    - no need for clustering of night-time businesses due to modern day construction capabilities (sound proofing) and use of conditions to control opening and delivery hours for businesses
- more support for independent bars, restaurants, retail, pop-up bars and restaurants, small scale live performance space
- integrated approach where all night-time businesses take shared responsibility for managing their area
- public transport policy to operate later into the night, particularly trains alongside a safety drive on transport and more widely across the city

Chapter 8 - Connectivity

Walking, cycling and public transport

- Need to comprehensive public transport / walking cycling system in place before people are tempted from cars including LTNs – need to look at Cities like Paris as an example
- need to tax cars according to dimensions to encourage smaller vehicles; more and safer cycle routes including use of canal towpaths

- rail freight needs to be more prominent in the BLP
- reallocation of road space is a must
- 15-minute neighbourhoods are essential part
- more bike hire to include toddler seats and trailers and more bile parking areas;
- move towards LTNs must be managed carefully not to damage business
- build transport infrastructure first followed by development
- Strategic Transport Assessment to support the Plan
- links to decarbonisation
- management and regulation of e-bikes and e-scooters
- needs of people with mobility issues who cannot readily use cycles or public transport
- rewards scheme for using sustainable transport via an app
- need to define short trip and long trip
- continued improvement of public realm across the City
- the following suggestions as to how public transport can be improved were made:
    - more trams (Metro)
    - regular, cheap, clean and reliable
    - free or highly subsidised at off peak times
    - more integrated park and ride schemes
    - free parking at Longbridge; parking controls
    - combined ticketing across modes – one ticket for a single journey
    - improve integration of buses and routes based strategic objectives and not profit
    - free buses within 3-mile radius of city centre
    - BLP needs to be more ambitious
    - re-regulate the buses
    - real time information at all bus stops
    - integration of cycling and public transport and more cargo bikes
    - more water buses on canals
    - more EV will be cleaner but will still want road space and parking for cars
    - a new bus station in Sutton Coldfield

Digital connectivity

- All who responded on this matter (100%) agreed that new development should make provision for future-proofed digital infrastructure especially as working from home is the norm and reduces the need to travel but also helps with micro-mobility hubs
- 82% of those that responded said that all developments should be required to meet an accredited standard for digital connectivity with only 18% disagreeing
- The Canals and Rivers Trust suggested that providers can use the canal towpath network for infrastructure

Chapter 9 – Locations for Growth

- 70% of those responding on the issue agreed that the principles for identifying the opportunity areas were the correct ones

- Support for the need for opportunity areas as it will always be that some parts of the city will be the focus of investment especially for housing growth
- Curzon Enterprise Zone is suggested as hub near to HS2 station
- Focus should be on brownfield land and not on the green belt while others promoted green belt sites
- Historic environment and character should be basis for new growth
- Impact on existing masterplans and SPDs needs to be considered
- Need to embed biodiversity and green infrastructure across all growth locations
- Gun Quarter should become mixed use residential
- Need for a strategic approach and clarity on how areas are identified
- Should be a focus on densification at transport nodes, corridors and proximity to public transport
- Comments on the approach to opportunity areas included: whether or not a green belt review will be done and should or shouldn't be considered as a growth option
- SPDs and Masterplans should be done at the same time as the BLP or, otherwise, not at all as this would add to uncertainty and create delays; they should also be flexible and not too onerous
- Allocation of opportunity areas should be meaningful and focussed; need to develop a concept plan and design code for each area identified
- Peddimore should be included as an opportunity area as it continues to develop
- 15-minute neighbourhoods should be taken into consideration
- Developer consortiums should take the lead on preparing masterplan / SPDs
- Some agreed that the opportunity areas are the right ones (25%) but the majority (75%) disagreed, some suggesting a lack of evidence as well as suggesting other areas including:
    - Public transport corridors
    - East Birmingham (in lieu of HS2 and Metro extension)
    - Local centres away from the City Centre
    - City Centre should be sub-divided into smaller areas
    - Specific areas of the green belt and land adjacent to the urban area
    - Bartley Reservoir area including Frankley
    - Cross border areas at Frankley into Bromsgrove
    - Aston and Witton near to Villa Park
    - Great Park in Rubery
    - Curzon Enterprise Zone is suggested as hub near to HS2 station
    - Gun Quarter should become mixed use residential

3.3 The Call for Sites

During the Consultation period 150 sites were put forward as proposed future development sites. There was a broad range of supporting information submitted with site information ranging from basic geographic information while others were submitted with full site surveys and supporting evidence as to why they should be allocated for future development. The breakdown of sites is set out in 3.1 above.

A full list of the detailed representations as well as the Council's response can be found on the Birmingham Local Plan webpages at:

Issues and Options Consultation | New Local Plan for Birmingham | Birmingham City Council

Conclusions on the Issues and Options Consultation.

The Consultation

Overall, the Issues and Options consultation was successful in its aims to publicise the Birmingham Plan and its process and extract views from a broad range of people, businesses, land owners and developers. Methods of publicity for the consultation including events, social media and a dedicated website page helped to highlight the issues and the different decisions which may be required in the coming years to accommodate growth and development across the City up to 2042. However, although this has provided a good basis for continuing to engage during the development of the Birmingham Local Plan and its future stages, there is still scope for improvements to how the Council engages the wider public to broaden the range of responses further, particularly to gain a greater geographic and socio-economic spread of views and comments.

The Call for Sites

150 new sites were put forward for suggestion as potential development sites by landowners, developers and agents. The majority of these sites are brownfield sites which have been added to the Council's Housing and Economic Land Availability Assessment (HELAA). All new site proposals will have to be assessed and weighed up against the evidence gathered for the Local Plan to see which proposals are deemed as suitable to take forward and be included as part of the future land supply for the city.

The need for further evidence

In order to work towards the Preferred Options stage of the Birmingham Local Plan, officers will use the representations and comments received to help shape the next stage in its development. In doing this, a range of further evidence will also need to be collected or commissioned which will help support arguments for and against the competing interests which have emerged in the representations received.

The evidence base is therefore crucial in giving us as much information as possible to make the informed decisions which will help to shape the Local Plan, but also allows the Council to demonstrate to the Planning Inspectorate that the Local Plan is sound.

The following is a summary of the evidence currently being put together alongside the consultation responses received to inform the preferred options as the next stage. It is not an exhaustive list and may be subject to change as the Local Plan progresses.

- Housing and Economic Development Needs Assessment (HEDNA)
- Housing and Employment Land Availability Assessment (HELAA)
- Gypsy & Traveller Accommodation Assessment
- Retail & Leisure Study
- Open Space Assessment
- Playing Pitches Assessment
- Strategic Flood Risk Assessment
- Water Cycle Study
- Waste Needs Assessment and Strategy

- Sustainable construction and Energy Studies
- Strategic Transport Assessment and more detailed studies where required
- Whole Plan Viability Assessment
- Green Belt Review
- Sustainability Appraisal
- Site specific technical assessments – both brownfield and greenfield sites.

Fig 1. Birmingham Local Plan Issues and Options Front Cover

Fig 2. Part of the Issues and Options Leaflet

Fig 3. Issues and Options Poster

4 Consultation on the Preferred Options document (July – August 2024)

The Preferred Options Consultation took place between 8th July and 27th August 2024. As above for the Issues and Options Stage, these sections will explain the background and approach to the consultation and the level of engagement from stakeholders and members of the public along with a summary of the responses including the key issues raised during the consultation. This includes the Council's response to the issues raised and how they will be addressed during the future stages in the development of the Birmingham Local Plan towards adoption.

The Preferred Options document was prepared under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It was effectively the first draft of the new Local Plan consisting of the Council's preferred development strategy, draft policies and site allocations considering the evidence gathered and the views gained from the Issues and Options consultation previously carried out.

The Preferred Options consultation therefore provided an opportunity for everyone to comment on the proposals and shape the emerging policies and allocations. The overarching development strategy set out in the Preferred Options document will ensure that growth is directed and prioritised in the right locations to enable continued targeted investment in infrastructure and services and the optimal use of public transport.

The main priorities set out in the Preferred Options Document were as follows:

- Reducing the city's carbon emissions and creating resilient and adaptive environments.
- Delivering at least 103,000 homes over the plan period, significantly increasing the number of affordable homes and providing a wide choice of housing sizes, types and tenures.
- Creating a strong economy through a continuous supply of land to meet modern workplaces while allocating under-used employment land in the right locations for new housing development.
- Focusing growth on locations which are well served by public transport, cycling and walking infrastructure and other services and amenities.
- Maximising densities to make efficient use of land and to support more local services and facilities such as public transport.
- Promoting Birmingham city centre and urban centres as a focus for retail, leisure, office, residential use and other appropriate uses.
- Encouraging innovative and enduring design and supporting the creation of healthy, safe and accessible buildings and environments.
- Connecting communities, workplaces, services and facilities via an integrated sustainable transport network which prioritises non-car modes.
- Ensuring that digital infrastructure is fit for the future.
- Increasing the biodiversity and greenness of the city, protecting the Green Belt and improving access to open space.
- Valuing and conserving the city's heritage assets.

The consultation document consisted of three main elements.

1. The first part of the document focused on the Vision and Objectives for the City from a planning perspective as well as the development strategy and overall levels of growth and its spatial distribution across the City. The projected development requirements for housing and employment for the City up to 2042 are as follows:
    i. Housing Need – the projected housing requirement for Birmingham up to 2042 calculated according to the Government's standard methodology is approximately 150,000 dwellings. The Preferred Options Document identifies an overall land supply sufficient for approximately 103,000 dwellings, plus completions to 31st March 2023 – leaving a shortfall or unmet need of approximately 46,000 dwellings.
    ii. Employment Need – an independent Housing and Employment Development Needs Assessment (HEDNA) was carried out in 2022 which assessed that a total of 295 hectares of employment land was required up to 2042, but the recommendation for the Local Plan was to maintain an ongoing 5-year supply of 67 hectares. The Preferred Options Document has identified an overall supply of 258 hectares through planning approvals, completions, landowner submissions and 53 hectares allocated as Birmingham's share of land at the West Midlands Rail Freight Interchange located in South Staffordshire. This would indicate a potential shortfall of 37 hectares, but officers have identified a further 123 hectares within the new Core Industrial Areas identified in the Plan which would be suitable for industrial development but haven't yet been promoted by landowners or developers. There are also 129 hectares currently in the 5-year industrial land supply, so the future industrial land supply requirements are capable of being met.

2. The second part of the document identifies a series of 27 proposed Growth Zones across the City where the majority of change and future growth is to be focussed as well as a series of proposed site allocations for development.

3. The third part of the document sets out a series of new and revised thematic planning policies which will apply across the City. There are 43 draft policies covering four main topic areas:
    i. Twelve proposed policies on Homes and Neighbourhoods including affordable housing, housing densities, special needs and older persons accommodation, student and shared accommodation, gypsies and travellers.
    ii. Eighteen proposed policies on climate and environment including carbon minimisation and reduction, retrofitting and renewable energy, flood risk, waste, biodiversity and green infrastructure, open space, playing pitches, historic assets, canals and green belt.
    iii. Seven proposed policies economy and centres including industrial land protection and provision, urban centres, the evening economy and tourism and cultural facilities.
    iv. Six policies on connectivity including active and sustainable travel, public transport, freight and digital connectivity.

The Preferred Options consultation document was also accompanied by a Sustainability Appraisal which assesses the policies to ensure they have a positive impact on social, economic and environmental factors.

Internal officer groups and meetings were also set up to ensure that officers from different departments engaged with and contributed towards the production of the Plan. This included officers from Birmingham Property Services, Highways, Transportation, Housing, Environmental Health, Public Health and Leisure.

The launch of the public consultation on the Birmingham Local Plan Preferred Options document was the second consultation stage for the Plan following the consultation on the Issues and Options Document in October-December 2022. All feedback and comments received are being taken into consideration in formulating the next stage of the consultation prior to the eventual adoption of the document. A Consultation Strategy was also produced which detailed how the consultation was to take place for this stage and for subsequent stages in the development of the Birmingham Local Plan. This Strategy will be reviewed and updated at each consultation stage.

Objectives of the Preferred Options Consultation

- Understand the requirements and priorities of Birmingham's citizens on what they want its future to be in terms of housing, jobs, infrastructure and the environment.
- Understand how the City's businesses, developers, investors and landowners see the future of Birmingham and how they can contribute to its planning and development.
- Understand how other key stakeholders see the future of Birmingham and how they can contribute to its planning and development.
- To inform all citizens and stakeholders about what we are doing and the stages we have to go through in plan making and adopting the Birmingham Local Plan.
- To secure the involvement of all citizens, business and other stakeholders now and throughout the process of preparing the Birmingham Local Plan.
- To obtain meaningful input, using a range of consultation tools and techniques, to ensure we have a local plan that best meets the needs of Birmingham.

Methods of Engagement

Preferred Options Document: A Preferred Options report entitled Birmingham Local Plan (July 2024) Preferred Options Document was produced that set out the following:

- Vision and Objectives for City
- How housing and employment land needs are to be met
- A Development Strategy for the City
- Policies, site allocations and objectives for 27 Growth Zones across the City
- Identification of other site allocations across the City
- Thematic policies relating to Homes and Neighbourhoods; Climate and Environment; Economy and Centres; Connectivity; and Implementation and Monitoring.

On-line Consultation Document: An interactive version of the Preferred Options consultation document was available online and was hosted by *Objective*. This allowed for consultees to comment on specific sections of the document as they navigated their way through. The software was also able to send automatic notifications to all consultees confirming that their consultation responses had been made. Following the consultation period all consultation representations have been collated and grouped together to allow for easier reviewing by officers. Some respondents chose to provide their response via email and these representations were then manually entered on to the *Objective* system by officers.

Call for Sites: To inform the Local Plan and provide suggested sites for future development, a 'Call for Sites' was undertaken in parallel with the Preferred Options consultation inviting landowners, developers and anyone who is aware of suitable sites to submit them for consideration through the plan making process. Submission of sites could be made directly using the online *Objective* system including any plans and other attachments. Some submissions were made via email which were then added to the *Objective* system by Officers. In making a submission, information was required on the following:

- Location and access to site
- Potential use and capacity
- Constraints and assets
- Potential infrastructure requirements

Summary Leaflet: A summary leaflet was produced that provided an overview of the key consultation issues in order to encourage people to get involved in the consultation without requiring them to go through the full Preferred Options paper.

Online news releases: The start of the consultation was highlighted on the City Council's website news pages and a link provided to website page for further information.

Social Media: Social media was used as a way to promote the consultation period, consultation events and to raise awareness of the issues that the Local Plan will be looking to address. Regular posts were made on the City Council's Twitter, Facebook and LinkedIn accounts. Approximately two posts per week were made through each medium throughout the consultation period and particularly when consultation event dates were approaching (see below).

Social media postings (Birmingham City Council Facebook and X accounts)

Postings were made on the City Council Social Media accounts on the following days. **Monday 8th July (2 posts)**

Today we begin consulting on the Birmingham Local Plan for six weeks. Find out more about how Birmingham will develop over the next 20 years and have your say at Link to the Birmingham Plan website

Talk to planning officers this week to find out more about the Birmingham Local Plan (link) at Small Heath Library (Wednesday), Handsworth Library (Thursday) and the Library of Birmingham (Saturday)

Wednesday 10th July

Today Council planning officers will be at Small Heath Library all day for you to find out more about the Birmingham Local Plan (link) and what it means for you

Thursday 11th July

Today Council planning officers will be at Handsworth Library all day for you to find out more about the Birmingham Local Plan (link) and what it means for you

Friday 12th July

On Saturday 13th July Council planning officers will be at the Library of Birmingham all day for you to find out more about the Birmingham Local Plan (link) and what it means for you

Monday 15th July (2 posts)

Find out more about the Birmingham Local Plan (link) and what it means for you in an online presentation and Q & A session at 6pm this evening. Log in via the link below

Microsoft teams event link

Talk to planning officers this week to find out more about the Birmingham Local Plan (link) at Selly Oak Touchstone Pears Centre (Wednesday) and Erdington Library (Thursday)

Tuesday 16th July

Find out more about the Birmingham Local Plan (link) and what it means for you in an online presentation and Q & A session at 12.30pm this lunchtime. Log in via the link below

Microsoft teams event link

Wednesday 17th July

Today Council planning officers will be at Selly Oak Touchstone Pears Centre all day for you to find out more about the Birmingham Local Plan (link) and what it means for you

Thursday 18th July

Today Council planning officers will be at Erdington Library all day for you to find out more about the Birmingham Local Plan (link) and what it means for you

Friday 19th July

Find out more about the Birmingham Local Plan (link) and what it means for you in an online presentation and Q & A session at 10.00 am this morning. Log in via the link below

Microsoft teams event link

Monday 29th July

Consultation on the Birmingham Local Plan remains open until 27th August. Find out more about how Birmingham will develop over the next 20 years and have your say at (link)

Friday 2nd August

On Tuesday afternoon, Council planning officers will be at the Trinity Centre in Sutton Coldfield for you to find out more about the Birmingham Local Plan (link) and what it means for you

Tuesday 6th August

Today between 3.30pm - 6pm, Council planning officers will be at the Trinity Centre in Sutton Coldfield for you to find out more about the Birmingham Local Plan (link) and what it means for you

Monday 12th August

There is just one more week left for you to have your say on the Birmingham Local Plan (link). Consultation closes on 27th August

Thursday 15th August

A final reminder that consultation on the Birmingham Local Plan (link) closes on Monday 27th August so last chance to have your say on how Birmingham will develop over the next 20 years

Posters: Posters promoting the consultation period and local events were distributed across the City to all libraries and a number of community centres and cultural facilities across the whole City.

QR Code: A QR code was generated and placed on all leaflets and online material to give members of the public easier access to the relevant website page to be able to comment on the document.

Display Boards for Events: Pull up banners were produced and used to promote the consultation and at consultation events. Three display boards were produced explaining the key issues and elements of the Local Plan consultation.

Online Members session: An hour-long online Teams session was held on 8th July 2024 (the first day of the Consultation) to explain the purpose of the Preferred Options document and the consultation process. The session began with a presentation by Officers followed by a question-and-answer session.

Consultation Events

Online consultation events: Three hour-long online Teams sessions were arranged open to everyone and advertised as online consultation events. A link was provided online on the City Council's website and the events were advertised on social media and on the posters distributed (see above). The session began with a presentation by Officers followed by a question-and-answer session. Relevant comments received were added to the Objective system alongside other comments including from the other Consultation Events (see below). The three events were held on the following dates and times:

Monday 15th July 2024	6pm-7pm
Tuesday 16th July 2024	12.30pm-1.30pm
Friday 19th July 2024	10am-11am

Face-to-face consultation events: Throughout the consultation period a number of consultation events were held across the city where people could come along, ask questions and find out more about the review. These events were publicised on the Council's website; on the posters which were distributed to venues across the city; and on the City Council's social media accounts as and when they were upcoming. One event was held in the City Centre (at the Library of Birmingham) with others being held in different quadrants of the City.

Venue	Date	Time
Small Heath Small Heath Library, Muntz Street	Wednesday 10th July 2024	10am-1pm; 2pm-5pm
Handsworth Handsworth Library Soho Road	Thursday 11th July 2024	10am-1pm; 2pm-5pm
City Centre Library of Birmingham	Saturday 13th July 2024	11am-5pm
Selly Oak Touchbase Pears Centre, Bristol Road	Wednesday 17th July 2024	11am-5pm
Erdington Erdington Library	Thursday 18th July 2024	10am-1pm; 2pm-5pm
Sutton Coldfield Trinity Centre, Church Road, Sutton Coldfield	Tuesday 6th August 2024	3.30pm-6pm
Sutton Coldfield Presentation to Sutton Coldfield Town Council, Trinity Centre, Church Road, Sutton Coldfield	Tuesday 6th August 2024	6pm

Duty to Co-operate

The Duty to Co-operate is a requirement of the Localism Act 2011 and is designed to ensure that all bodies involved in planning work together on strategic issues that are greater than local significance. It places a legal duty on LPAs and specified prescribed bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

The Duty to Co-operate is not a duty to agree, however LPAs should make every effort to secure the necessary co-operation on strategic cross boundary matters before they submit their Local Plans for examination. The co-operation should produce effective and deliverable policies on strategic cross boundary matters.

Other public bodies, in addition to LPAs, are subject to the Duty to Co-operate by being prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by the National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013.

The Prescribed Bodies are required to co-operate with LPAs and the other Prescribed Bodies. These Bodies play a key role in delivering local aspirations, and co-operation between them and LPAs is vital to make Local Plans as effective as possible on strategic cross boundary matters. The Bodies should be proportionate in how they do this and tailor the degree of co-operation according to where they can maximise the effectiveness of plans.

Planning officers representing the 14 Councils which make up the Birmingham and Black Country Housing Market Area have met regularly (monthly) over the last four years to discuss the housing shortfall across the whole HMA and determine a strategy to reduce the shortfall. The local authorities which make up the HMA were all contacted specifically before and during the consultation to discuss the potential housing and employment land shortfalls that Birmingham will be predicting for the Local Plan period. A presentation on the Birmingham Local Plan consultation was also made at one of the regular monthly meetings held.

5 Analysis of the Preferred Options Consultation

Response Numbers

Number of consultation respondents = 184

This was made up from the following:

- 14 Councils (Cannock Chase, Dudley, Lichfield, North Warwickshire, Nuneaton and Bedworth, Sandwell, Solihull, South Staffs, South Warwickshire, South Worcestershire, Walsall, Wolverhampton, Worcestershire County) + 1 Town Council (Sutton Coldfield)
- 26 Public bodies / Duty to Cooperate partners / utilities e.g. Environment Agency, Historic England, National Highways, Network Rail, Severn Trent, TfWM
- 34 Interest groups / campaign groups / Action groups
- 82 Private sector organisations (landowners, developers)
- 28 Individuals

Total no. of formal comments received = 255

Call for Sites = 52

- 8 residential sites
- 29 mixed-use sites
- 4 Employment
- 1 Industrial / commercial sites
- 10 undetermined uses
- 10 on Green Belt sites
- 42 on previously developed / brownfield sites

No. of people making comments during the face-to-face consultation events = 7

Key Policies and Responses / Formal Representations

GZ.7 Newtown

- Concern over high residential densities at Newtown Shopping Centre and New John Street
- Suggested inclusion of improvements at Phillips Street Park and St Georges Park
- Establishment of cultural quarter around Barton Arms and Potters Lane

GZ.8 Hagley Road Corridor

- Requires greater acknowledgement of sustainable transport modes
- Inclusion of potential 2,000 homes at New Graden Square
- Greater emphasis on local centres including Edgbaston Village and high density living.
- Acknowledgement of green network along canal and Chad Brook Way
- Inclusion of the BCU City South Campus

GZ.9 South Edgbaston

- Important to link future development to Edgbaston Stadium
- Re-naturalisation of River Rea is important

- Objection from Sport England and West Midlands Police to potential development of playing fields and sports facilities at Tally Ho!

GZ.10 Rea Valley Urban Quarter

- Co-ordination with Digbeth Growth Zone is essential
- Suggested Level 2 SFRA is required
- Alignment with Rea Valley Urban Quarter SPD

GZ.11 Ladywood Regeneration Initiative

- More green spaces required
- Concern over densities and a lack of affordable homes in future proposals
- Concerns over current lack of engagement and that redevelopment will force residents out with insufficient compensation
- Concern over future of Gilby Road Park but support for the proposal of two new urban parks

GZ.22 Selly Oak

- Improvements to cycling provision
- More social and family housing
- Support for the vision for growth around the Birmingham University campus.
- Suggested Level 2 SFRA is required
- Selly oak retail park should be redesignated as part of a local centre

GZ.23 Erdington

- Consistency of capacity within the Growth Zone compared to the HELAA
- Support for Library included as part of cultural cluster

GZ.24 Tyseley Environmental Enterprise Park

- Support for improved connectivity with Birmingham Airport
- Support for improvements to Grand Union Canal and River Cole Valley
- Suggested Level 2 SFRA is required

GZ.25 Washwood Heath

- Flood risk at northern part of the Growth Zone - Suggested Level 2 SFRA is required
- Support for site allocation on land currently occupied for HS2 construction

HN1: New residential development

- Questions on the deliverability of housing supply sites
- General support for the policy but questions over whether sites can cater for all housing needs and general wording of the policy
- Recommended to allocate more sites than required to act as a buffer

HN6: Protecting existing housing

- Concern expressed over loss of quality homes and family homes
- Concern over displacement of communities and the need for housing whilst estates are being re-built

- Concern over weakness of policy in preventing loss of family housing to other uses e.g. HMOs

HN9: Housing regeneration

- Policy could be strengthened to ensure relevant social infrastructure is provided
- Need for carbon reduction should not lessen opportunity for demolition where necessary
- Support for redevelopment including increased densities in areas such as Druids Heath and Ladywood
- Need to ensure incorporation of community safety

HN10: Gypsies, travellers and travelling showpeople

- General support for the policy
- If needs in Birmingham can be met, then consideration could be given to the needs of neighbouring authorities where shortfalls occur

CE13: Open Space

- Support for policy in the protection and increased quality of open space
- Requirements to provide open space may cause viability issues

CE14: Playing pitches and sports facilities

- General support for Policy overall although requests for wording amendments to broaden its scope in line with NPPF

CE16: Historic Environment

- General support for Policy overall
- Requests for wording amendments to ensure consistency with the NPPF and the proposed Historic Environment SPD and not provide blanket protections when not necessary
- Canal network should be recognised as a non-designated heritage asset

6 Conclusions on the Issues and Options Consultation.

The Consultation

Overall, the Preferred Options consultation was successful in its aims to publicise the Birmingham Plan and its process and extract views from a broad range of people, businesses, land owners and developers. .....

The Call for Sites

The need for further evidence following revisions to the NPPF and the Standard Housing Methodology in December 2024

Fig 1. Birmingham Local Plan Preferred Options Front Cover

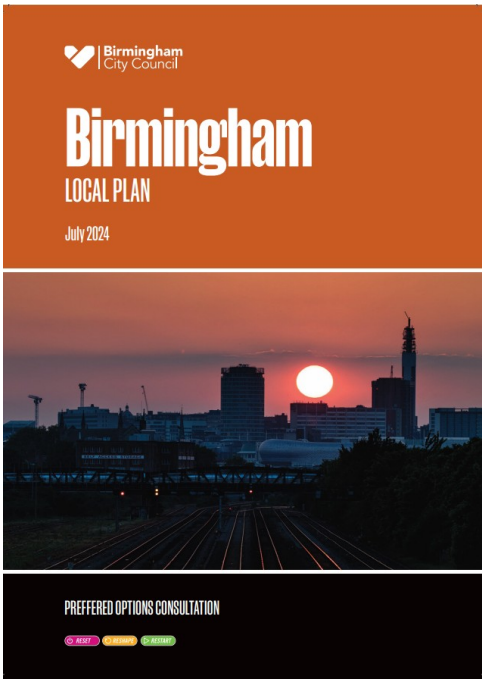

Fig 2. Part of the Preferred Options Leaflet

Fig 3. Preferred Options Poster